



United States
Department of
Agriculture

Forest
Service

Idaho Panhandle
National Forests

Coeur d'Alene River
Ranger District

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File Code: 1950

Date: May 1, 2007

Hello,

Enclosed is your copy of the Jo-Cat Decision Notice (DN), identifying the Proposed Action as the Selected Alternative. For the convenience of our interested public and in an effort to conserve paper and reduce publication costs, documents related to this proposal are also available to the public on our Forest's internet web page: <http://www.fs.fed.us/ipnf/eco/manage/nepa>.

This decision is subject to administrative review (appeal) pursuant to 36 CFR 215. Appeals, including attachments, must be filed (via regular mail, fax, email, hand delivery, express delivery or messenger service) with the Appeal Deciding Officer within 45 days following the date of publication of the legal notice. The publication date of the legal notice in the *Coeur d'Alene Press* newspaper is the exclusive means for calculating the time to file an appeal. Those wishing to appeal should not rely upon dates or timeframe information provided by any other source.

Hard copy (printed appeals) must be mailed to: **USDA Forest Service, Northern Region, Attn: Appeal Deciding Officer, P.O. Box 7669, Missoula, MT 59807**; delivered to: **USDA Forest Service, Northern Region, Attn: Appeal Deciding Officer, 200 West Broadway, Missoula**; or submitted by fax to: **USDA Forest Service, Northern Region, Attn: Appeal Deciding Officer, (406) 329-3411**.

Electronic appeals must be submitted to: appeals-northern-regional-office@fs.fed.us. The subject line should contain the name of the project being appealed. There are three acceptable formats for electronically filed appeals: MS Word, Word Perfect, and rich text format or .rtf).

If an appeal is received on this project, there may be informal resolution meetings and/or conference calls between the Responsible Official and the appellant. These discussions would take place within 15 days after the closing date for filing an appeal. All such meetings are open to the public. If you are interested in attending any informal resolution discussions, please contact the Responsible Official or monitor the following website for postings about current appeals in the Northern Region of the Forest Service: http://www.fs.fed.us/r1/projects/appeal_index.shtml.

I am the Responsible Official for this project. For more information, please contact Project Leader Bob Rehnberg (208-769-3054) or District Ecosystem Staff Officer Sherri Lionberger (208-769-3022). Thank you for your interest in this project.

Sincerely,

RANDY/SWICK
District Ranger

enclosure



**United States
Department of
Agriculture**

Forest Service

Northern Region

**Idaho Panhandle
National Forests**

May 2007

**Coeur d'Alene River Ranger District
Jo-Cat Resource Area**

Decision Notice



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Jo-Cat Decision Notice

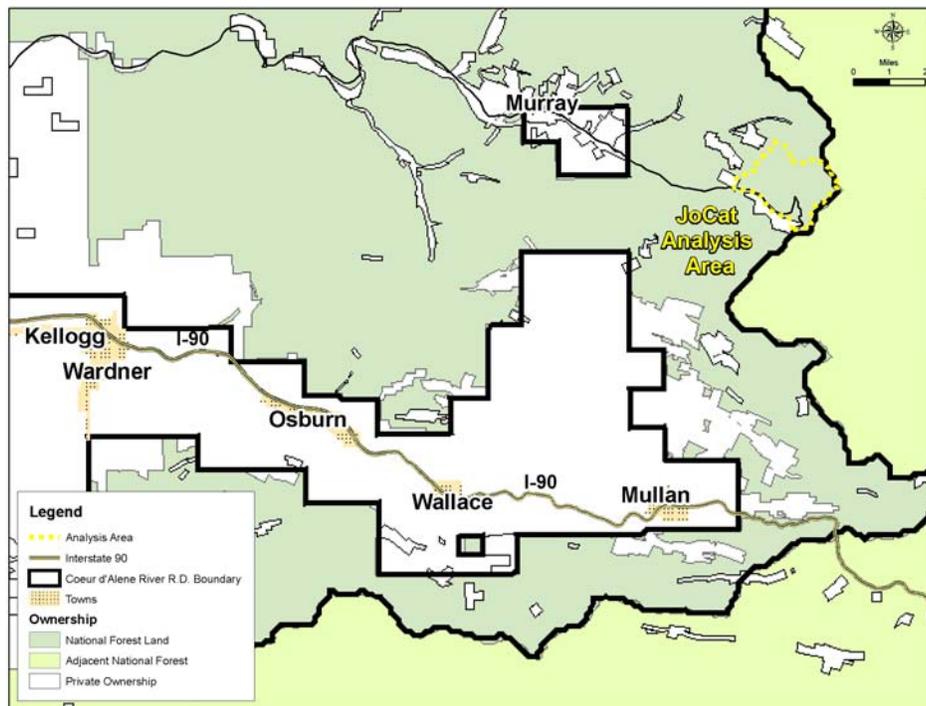
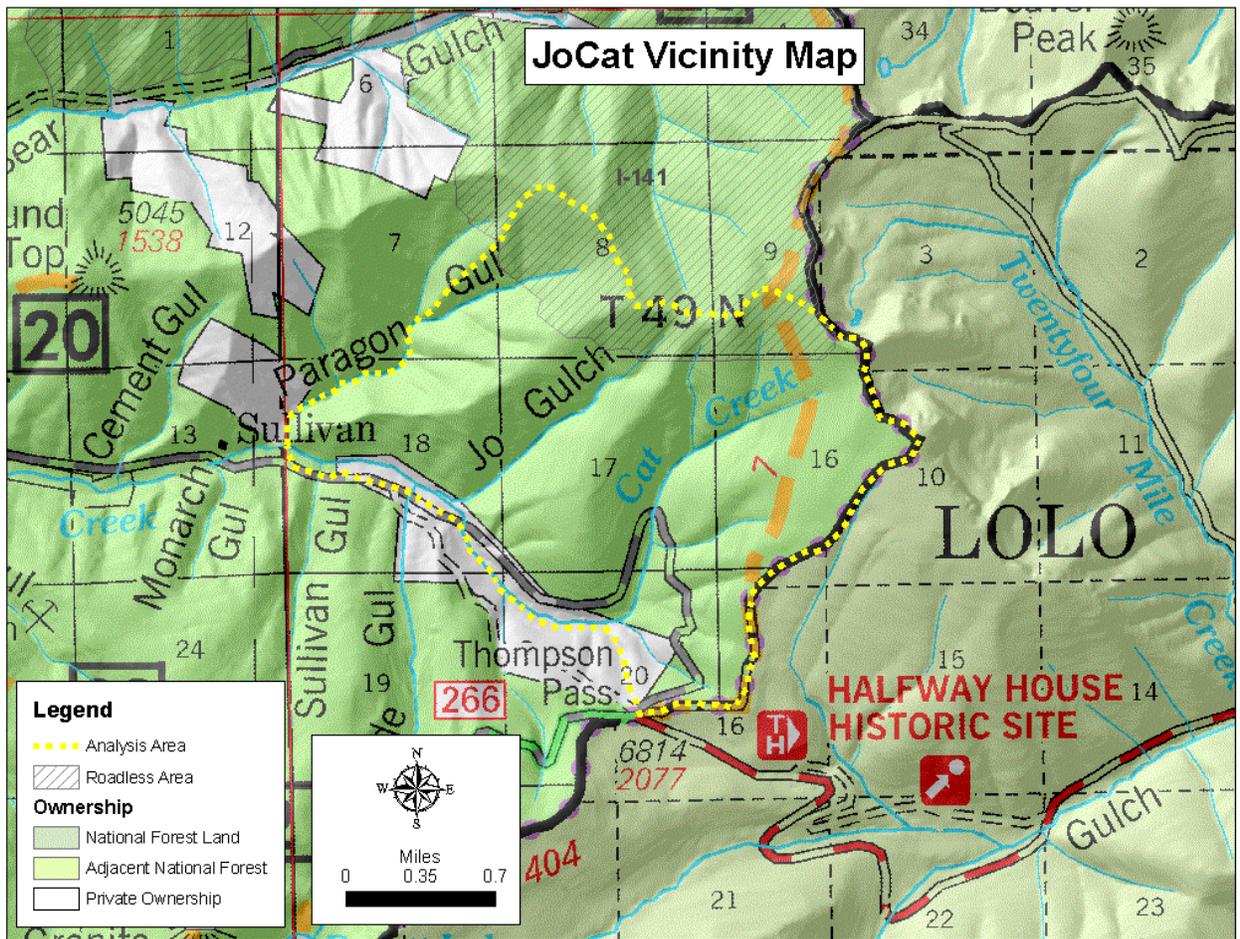
Table of Contents

1. Introduction to the Jo-Cat Project	
1.1. Overview of the Resource Area	Page DN-1
1.2. The Analysis and Decision Process.....	Page DN-1
1.3. Purpose and Need for Action	Page DN-2
1.4. Public Involvement and Proposal Development	Page DN-2
2. Specific Activities & Features of the Selected Alternative	
2.1. Description of Activities That Will Occur Under the Selected Alternative	Page DN-3
2.2. Implementation Features Related to Resources	Page DN-6
2.3. Schedule of Activities	Page DN-9
2.4. Mitigation That Will Be Required to Occur.....	Page DN-9
2.5. Implementation and Effects Monitoring.....	Page DN-10
2.6. Synopsis of Cumulative Effects.....	Page DN-10
3. Decision Rationale	
3.1. Effectiveness of the Alternatives in Meeting the Purpose and Need.....	Page DN-11
3.2. Effects of the Alternatives on Other Resources	Page DN-12
3.3. Consistency With the Goals and Findings of Other Laws, Regulations, and Policy.....	Page DN-14
4. Finding of No Significant Impact	Page DN-17
5. Documents and Project Files	Page DN-20
6. Appeal Rights & Implementation	Page DN-21

ATTACHMENT A – Response to Public Comments

ENCLOSURE - Map of Activities under the Selected Alternative and Logging Systems Map

Vicinity Maps of the Jo-Cat Resource Area. The dotted yellow line represents the analysis area boundary; the area hatched with black represents an overlapping adjacent inventoried roadless area.



JO-CAT RESOURCE AREA Decision Notice

Idaho Panhandle National Forests
Coeur d'Alene River Ranger District

Responsible Official:
Randy Swick, District Ranger

1. Introduction to the Project

1.1. Overview of the Resource Area

Vegetation management activities are proposed on public lands in a 2,266-acre area on the Coeur d'Alene River Ranger District near the Idaho/Montana border in the vicinity of Thompson Pass. This area is located in three drainages (Jo Gulch, Cat Creek, and a portion of Paragon Gulch) located in the headwaters of Prichard Creek, which flows into the North Fork of the Coeur d'Alene River. This area has been identified for the purposes of this analysis as the Jo-Cat Resource Area. An estimated 93 percent of lands (approximately 2,107 acres) within the project boundary are managed by the Coeur d'Alene River Ranger District of the Idaho Panhandle National Forests (IPNF). The remaining 7 percent (approximately 159 acres) are privately owned, belonging to the Coeur d'Alene Placer Mining Company.

The Jo-Cat Resource Area includes all or portions of sections 7-9 and 16-21 of T49N, R6E, Boise Meridian. Forest Highway 9 runs along the southern portion of the resource area. The Jo-Cat Resource Area also includes 369 acres of the 8,674-acre Maple Peak Roadless Area #01-141 (depicted by the hatched area in Figure 1) along its northern boundary. Elevations within the resource area range from 3,500 to 6,500 feet. Much of this area has been identified by the IPNF Forest Plan as to be managed for the long-term growth and production of commercially valuable wood products. These productive areas transition into lands of less commercial interest and more suited for maintenance of existing resource productive potential in the higher elevations.

1.2. Purpose and Need for Action

A considerable amount of commercially valuable lodgepole pine timber is being lost, and projected to be lost, within the Resource Area as a result of the mountain pine beetle outbreak. Forest Plan management direction in this Resource Area is to recover this loss of timber value while still providing for wildlife habitat and other resource needs. The projected mortality rates also raise concerns of fuels build-up over time that would lead to an increased risk of large, high-intensity wildfire in this area (Specialist's Report on Fire/Fuels, p. FF-5, FF-6). **We need to recover a portion of the timber value that is being lost to mountain pine beetles.**

Most of the timber in this area is second growth in nature, 90 years of age, the result of the stand replacement wildfire of 1910. Western larch trees make up a considerable amount of the timber component in many of the stands. Western larch is a long-term seral species, and promoting western larch on the landscape is recommended by both the Coeur d'Alene Geographic Assessment and the Interior Columbia Basin Assessment. Thinning treatments that would reduce crown and moisture competition and favor diameter growth would help to sustain the larch component over the long term. Reducing stand densities would also reduce the risk of large, high-intensity wildfire that may kill the western larch component of these stands. **We need to promote the healthy western larch component where it exists on this landscape.**

Forest Highway 9 leading up to Thompson Pass has been identified as a Secondary Resource Protection Zone to provide an ingress/egress travel corridor under the Shoshone County Fire Mitigation Plan (PF Doc. FF-02). This route would provide an escape route if a large fire was moving into the Prichard/Murray area from the west. Some vegetative treatments along this roadway would be beneficial to providing a safe travel corridor during a fire event. **We need to reduce potential fire intensities while maintaining the general visual character along the fire escape travel corridor.**

In summary, the purpose and need for this project is three-fold:

- *Recover a portion of the timber value that is (or projected to be) lost to mountain pine beetles.*
- *Promote the existing healthy western larch component where it exists on this landscape.*
- *Reduce potential fire intensities while maintaining the general visual character along the fire escape travel corridor within this project area.*

1.3. Public Involvement and Proposal Development

Scoping is the early and open process for determine the scope of issues to be addressed and for identifying the significant issues related to a proposed action (Council on Environmental Quality, 1986; Project File Document CR-028). The participation of affected federal, state and local agencies, affected tribes, and other interested persons through the Forests' Quarterly Schedule of Proposed Actions (January 18, 2006; Project File Documents. PI-01 through PI-04), a letter (April 19, 2006; PF Doc. PI-06), and a legal ad published in the Spokesman-Review newspaper (April 21, 2006; PF Doc. PI-07).

On March 7, 2006, the Jo-Cat proposal was introduced to the U.S. Fish and Wildlife Service so that the proposed action and project design features would incorporate any issues and concerns identified by their agency (PF Doc. PI-05). This step was taken because the project area is located within a lynx analysis unit (LAU) and Canada lynx is listed as a threatened species under the Endangered Species Act.

During the scoping period, four letters were received; from the Northwest Access Alliance (Project File Document PI-08); Idaho Parks & Recreation (Project File Document PI-10); Kootenai Environmental Alliance (Project File Document PI-12); and Idaho Conservation League (Project File Document PI-14). Each of these provided comments that helped identify issues and define the analysis of effects and proposed treatments. A response letter was issued to each of those that provided comment directly addressing issues and concerns that were raised (Project File Documents PI-09, PI-11, PI-13, PI-15).

The Interdisciplinary Team was able to resolve key issues during the design of the proposal; therefore none were carried into the analysis. Other issues were included in the analysis to demonstrate compliance with laws or regulations, to address current management concerns, or because they are of public interest. For this project area, analysis issues included fire/fuels, forest vegetation, TES plants, aquatic resources, soils, wildlife, recreation, scenery, and finances. These issues are organized by resource with indicators to measure environmental effects of each alternative and are described in greater detail in the EA, Chapter 3 (page EA-19) and in the Project Files (Specialist's Reports).

Development of alternatives was based on the existing condition of resources and designed in response to the purpose and need identified for the project (EA, p. 2-12). Two alternatives were considered in detail – the No-Action Alternative and the Proposed Action Alternative. The No-Action Alternative analyzed for this project represents the effects of not implementing the proposed activities, as well as the effects of past, ongoing and reasonably foreseeable activities. No new activities are proposed on federal lands in the Jo-Cat Resource Area under the No-Action Alternative.

The Proposed Action Alternative represents the effects of implementing the proposed activities, as well as the effects of past, ongoing and reasonably foreseeable activities (EA, Appendix A). Activities and features of the Proposed Action are described in detail in EA, Section 2.B. Several other alternatives, some suggested by the public, were considered but eliminated from further analysis as discussed in the EA, Section 2.D.

Detailed descriptions of the alternatives, existing conditions, and environmental effects that would occur under each alternative were analyzed and documented in the Jo-Cat Environmental Assessment (EA), which was mailed to the public in March 2007. The EA was available to the public for a 30 day review, during which time three comment letters were received; from Idaho Parks & Recreation, Kootenai Environmental Alliance, and Idaho Conservation League (see Attachment A; and Project Files, Public Involvement).

1.4. Overview of the Analysis and Decision Process

National Forest planning takes place at the national, regional, forest, and project levels. The Jo-Cat EA is a project-level analysis; its scope is confined to addressing the purpose and need and possible environmental consequences of the project. It does not attempt to address decisions made at higher levels. It does, however, implement direction provided at those higher levels. The Jo-Cat decision does not preclude the need for future decisions to help meet desired conditions in the resource area.

The Idaho Panhandle National Forests (IPNF) Forest Plan (USDA 1987) provides the primary management direction for this decision. The Forest Plan describes goals and management standards for the IPNF as a whole and for the subdivisions of the Forest referred to as management areas. Other direction is provided by the Interior Columbia Basin Assessment, Coeur d'Alene Basin Geographic Assessment, Northern Regional Overview, the National Fire Plan, and the Shoshone County Fire Mitigation Plan. The analysis and decision processes for this project are based on the consideration of the best available science. The manner in which best available science is addressed can be found through the disclosure of rationale found within this decision and the response to comments, the EA, Biological Assessment, Specialists' Reports, and the Project Files.

My decision is based on the following criteria:

- *the extent to which the alternatives address the purpose and need*
- *the effects of the alternatives on other resources*
- *consistency with the goals and findings of Forest policy and legal mandates*

I have decided to implement the Proposed Action as described in the March 2007 EA, without modification (please refer to the enclosed Selected Alternative map). Specific activities and features of the Selected Alternative are described in Section 2 of this document, followed by a discussion of the rationale behind my decision (Section 3), the Finding of No Significant Impact (Section 4), availability of documents and project files (Section 5), and appeal rights and implementation information (Section 6).

2. Specific Activities & Features of the Selected Alternative

Table 1. Summary comparison of activities proposed on National Forest System lands in the Jo-Cat Resource Area under each alternative.

Harvest Activity	No-Action	Proposed Action
Commercial thinning to promote existing healthy western larch	0	119 acres
Lodgepole pine removal in stands with mountain pine beetles	0	103 acres
Lodgepole pine salvage	0	30 acres
Lodgepole pine overstory removal	0	13 acres
Non-commercial understory thinning and fuel reduction	0	14 acres
Total commercial harvest	0	265 Acres
Total all treatments	0	279 acres
Yarding Methods	No-Action	Proposed Action
Tractor	0	64 acres
Skyline	0	81 acres
Cable	0	1 acre
Helicopter	0	119 acres
Fuel Treatment in Harvest Units	No Action	Proposed Action
Prescribed burning in commercial thinning, lodgepole removal units	0	201 acres
Grapple pile and burn	0	20 acres
Landings	No Action	Proposed Action
Helicopter log landings constructed <ul style="list-style-type: none"> ▪ 1 landing (one-third acre) along the reconstructed section of Road 6006, in Unit 5 ▪ 1 landing (one-half acre) along the newly-constructed section of Road 6006, in Unit 12 	0	2
Roads	No Action	Proposed Action
Permanent road construction	0	1.2 mile
Temporary road construction	0	0.3 mile
Road reconstruction	0	1.8 mile
Timber (Sawlog) Volume	No Action	Proposed Action
Hundred cubic feet (ccf)	0	3,300
Million board feet (mmbf)	0	1.7
Approximate minimum advertised value	0	\$50,000

2.1. Description of Activities That Will Occur Under the Selected Alternative

Commercial Thinning in Western Larch (Approximately 119 acres)

Commercial thinning will occur on a total of approximately 119 acres of western larch stands to increase the long-term resilience and maintenance of the existing overstory western larch component. Thinning will approximate a 20 to 25-foot spacing, leaving about 90 to 110 trees per acre. The largest and healthiest trees will be retained regardless of spacing or species, although some consideration will be given to underburn survival and susceptibility to insects and disease. Diameters of leave trees are expected to range from 10 to 18 inches at breast height.

There are several scattered one- to two-acre pockets along the western ridge of Unit 12 where the species component is western larch and lodgepole pine. Residual spacing in these areas may closer approximate a shelterwood harvest since much of the lodgepole pine is infested with beetles. Efforts will be made to retain any

larger healthy lodgepole pine to fill in the gaps, but residual tree densities will likely be less than the 90 to 110 trees per acre in these one- to two-acre pockets. All unmerchantable dead will remain standing unless needed to be felled for safety reasons.

Prescribed fire would be introduced into all larch thinning units except in Unit 12b which is currently planned for grapple piling after overwintering. Prescribed fire would treat the smaller activity fuels to reduce the short-term increase in fire risk associated with the commercial thinning activity. No control lines are planned at this time for burn areas, relying on natural fuelbreaks in most locations.

Specific activity locations are identified on the enclosed Selected Alternative map. Treatment units have been broken into sub-units in order to track differing logging systems; please refer to enclosed Logging System Map.

Table 2. Commercial thinning units proposed in Western larch stands.

Unit #	Acres	Logging system	Access	Fuels
1	3	Skyline	Reconstructed section of Road 6006 and newly constructed section to link that road to Forest Highway 9	Jackpot burn
2a	3	Tractor	Reconstructed section of Road 6006 and newly constructed section to link that road to Forest Highway 9	Jackpot burn
2b	10	Helicopter (to avoid ground-based yarding on slopes over 35%)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Jackpot burn
3	7	Skyline	Reconstructed section of Road 6006 and newly constructed section to link that road to Forest Highway 9	Jackpot burn*
7	18	Skyline	Reconstructed section of Road 6006 and newly constructed section to link that road to Forest Highway 9	Jackpot burn*
12a	10	Skyline	Temporary road and the newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Jackpot burn
12b	20	Tractor	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Grapple pile
12c	24	Skyline	Temporary road and the newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Jackpot burn
12d	16	Helicopter (multiple terrain breaks would make skyline yarding very difficult)	Flown uphill to the landing in Unit 12b on the newly constructed section of Road 6006 or downhill to the landing along Highway 9	Jackpot burn
16	8	Helicopter (the highway and guard rail above the unit would not allow safe skyline yarding)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Jackpot burn

*Portions of Units 3 and 7 would be assessed after harvest to ensure leave tree size and species composition would support prescribed fire treatments without causing excessive tree mortality. These areas of the units may be lopped and scattered instead of jackpot burned if tree size and species mix don't support burning.

Lodgepole Pine Removal Treatment (Approximately 103 acres)

These treatment units are located in stands with a high component of lodgepole pine where considerable mortality is present and in stands that have tree sizes and densities to support a moderate to high risk of projected mortality. All merchantable lodgepole pine will be harvested. Timber harvest will include lodgepole pine down to 5 inches in diameter in conventional (non-helicopter) yarding units and 7 inches in diameter in helicopter units. The objective within the treatment areas will be to regenerate the units to lodgepole pine. A component of live and dead lodgepole with diameters that range from 8-15 inches will be retained as reserve trees scattered throughout these units to provide an aerial seed source, future snag habitat, and future down woody debris. There will be between 2 to 6 of these lodgepole trees per acre depending on the conditions in the treatment area. All trees of other species (western larch, douglas-fir, grand fir, mountain hemlock, alpine fir and spruce) will generally be retained within these units, with some consideration being given to removal of trees under 10 inches in diameter that would likely not survive prescribed fire treatments. This harvest of understory trees of other species will only occur in Units 5 and 13, where they comprise a considerable component of the unit.

Residual tree components in these lodgepole removal units will vary as the existing stand conditions vary, creating a natural mosaic of openings to commercial thin appearance on any given acre. Units 4, 8, 11 and 15 would be best described as having an irregular group seed tree appearance (leaving approximately 15 trees per acre with a range from 6 to 30 trees per acre). Units 5, 13, and 14 will have more of an irregular group shelterwood appearance (leaving approximately 28 trees per acre with a range from 10 to 50 trees per acre). These harvests will remove the potential fuels loadings and provide the openings for regeneration establishment.

Table 3. Units proposed for lodgepole pine removal.

Unit #	Acres	Logging system	Access	Fuels
4	3	Helicopter (to minimize ground disturbance and because this small unit would require multiple yarding systems)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Underburn
5a	4	Skyline	Reconstructed section of Road 6006	Underburn
5b	24	Tractor	Reconstructed section of Road 6006	Underburn
8	22	Helicopter (to avoid ground-based yarding on steep slopes)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Underburn
11a	1	Cable	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Lop and scatter
11b	2	Helicopter (to avoid ground-based yarding on slopes over 35%)	Flown to the landing in Unit 12b on the newly constructed section of Road 6006	Underburn
11c	9	Tractor	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Underburn
11d	13	Skyline	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Underburn
13	6	Helicopter (to avoid considerable road construction)	Flown to the landing in Unit 12b on the newly constructed section of Road 6006 or flown downhill to the landing along Highway 9	Underburn
14	14	Helicopter (to avoid considerable road construction)	Flown to the landing in Unit 12b on the newly constructed section of Road 6006	Underburn
15	5	Helicopter (to avoid considerable road construction)	Flown to the landing in Unit 12b on the newly constructed section of Road 6006	Underburn

All removal units are planned for prescribed fire after harvest (except the 1-acre piece in Unit 11 below the new road construction in Cat Creek). With the introduction of fire, the treatment areas will favor the natural re-establishment of these lodgepole pine mosaics and provide future high-quality forage habitat areas for lynx. Some of the lodgepole pine cones are serotinous, needing the heat of fire to open them. The only fireline planned at this time is a machine fire line separating Units 5 and 6. All other burning will be without control lines, relying on natural fuelbreaks (low ground fuel component) in most locations. In Units 4, 5, and 16, slashing of submerchantable trees will occur. Interplanting of white pine will be scheduled for the openings created in Units 5, 11, and 13 for diversity and to comply with Forest Plan direction. Planting of western larch will not be considered since snowshoe hare habitat, in lynx forage areas, is better provided by regeneration that does not lose its needles in the winter.

Lodgepole Pine Salvage (Approximately 30 acres) and Overstory Removal Treatments (Approximately 13 acres)

Lodgepole pine salvage units were identified where mortality is occurring due to mountain pine beetles, but there is a high component of other tree species present. Salvage units will only remove dead or beetle-infested lodgepole pine trees. Live lodgepole pine will not be harvested. The residual species component will provide enough trees to retain stand structure. Logging slash will be lopped and scattered for fuels treatment. Lop and scatter treatments get the fuels onto the ground so they would decompose more quickly. Treatments in Unit 6 will remove all lodgepole pine trees over 9 inches in diameter (the high risk component of this stand) while leaving the rest of the overstory. The residual overstory will provide some diversity above the existing understory that is already established on this site. The intent in Unit 6 is to allow the climax understory stand that is already established to provide lynx forage habitat in the near term.

Table 4. Lodgepole pine salvage and overstory removal units.

Unit #	Acres	Logging system	Access	Fuels
6	13	Helicopter (to avoid excavating trails and to reduce damage to understory trees)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Lop and scatter
9a	9	Helicopter (to avoid ground-based yarding on steep slopes)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Lop and scatter
9b	11	Helicopter (to avoid ground-based yarding on steep slopes)	Flown to the landing between Units 5a and 5b on the reconstructed section of Road 6006	Lop and scatter
10a	2	Skyline	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Lop and scatter
10b	8	Tractor	Newly constructed section extending Road 6006 out the dividing ridge between Cat Creek and Jo Gulch	Lop and scatter

Non-commercial Fuels Reduction Treatments (Approximately 14 acres)

Non-commercial fuel reduction treatments (understory thinning and slashing with hand piling and burning) will occur in areas that extend for a distance of 200 to 300 feet below Forest Highway 9, from Unit 16 up to Thompson Pass. Understory trees under 10 inches in diameter and larger snags will be cut in these areas to reduce crown bulk density, raise the crown base height, and reduce potential fire intensity coming up to the roadway. An understory commercial thin appearance is expected to be the result.

Transportation System Development (Approximately 6 acres of right-of-way clearing)

Approximately 1.2 miles of new system road construction will be needed to access treatment areas under the Selected Alternative. This includes constructing approximately 0.2 miles of road to connect the existing approach road off Forest Highway 9 to Road 6006, and extending Road 6006 for 1 mile around the divide ridge between Cat Creek and Jo Gulch. There are no drainage crossings in the new road construction. Rolling dips will be incorporated into the road design for control of any surface erosion. The new roadway will be constructed to a width of 14 feet to allow for skyline yarding equipment. Clearing slash will be windrowed in the 0.2 mile segment (link road) for later use during road recontouring. Clearing slash will be windrowed or scattered for the rest of the new road construction, although some piling and burning may be needed when crossing the flat ridge.

A gate will be installed during the life of the timber sale at the Forest Highway 9 junction. This gate will remain closed except when timber sale activities occur, at which time it would be closed at the end of daily activities. This route will only be available for administrative use, it will not be open or available to the public under District Travel Plan restrictions. An earth barrier will be installed behind the gate by the purchaser at the end of use, for additional security, and interior roads will be waterbarred and seeded. At the conclusion of post-sale activities, the link road will be recontoured and the talus slope past Unit 7 will be pulled across the roadway, creating an effective closure to any motorized use into the new road construction.

Approximately 1.8 miles of road reconstruction will be needed on Road 6006. Brushing and blading will be needed over the entire length. Sections of the road will need to be widened from 12 feet to 14 feet from the link road up to the draw before Unit 2 and from the talus slope above Unit 7 to the middle of Unit 8, for a total of 0.4 miles. This widening will generally consist of encroaching into the cutbank or dropping the grade. Eight French-drain rock fords (dipped to eliminate diversion potential) will be established at the existing drainage crossings. This will entail 4 to 6-foot road widening at the draws for alignment and placement of rock. These crossings are primarily intermittent stream flow or ephemeral in nature. Two truck turnouts will be constructed; one at Unit 2 and the other above Unit 7. Some scattered right-of-way clearing will be needed to remove shoulder trees along this roadway. An effort will be made to retain the few existing large western larch relics along the edge of the road. Loss of a couple of old residuals may occur with the construction of the new roadway, but most would be avoided.

Approximately 0.3 miles of temporary road will need to be constructed on the divide ridge between Cat Creek and Jo Gulch in order to reach reasonable terrain breaks for logging in Units 12a and 12c. Upon completion of use, this roadway will be re-contoured by the purchaser and then seeded.

A helicopter landing (approximately one-third acre in size) will need to be constructed along Road 6006 between Units 5a and 5b. Some excavation will need to occur to create an oval landing in this area. Another helicopter landing (approximately one-half acre in size) will need to be cleared in Unit 12b (no excavation is anticipated for this landing). There is a 50 by 100-foot gravel turnout along Forest Highway 9 near the mouth of Jo Gulch that may be feasible to use as a small log landing (refer to section 2.B.3. Mitigation Measures for more information on conditions of use). In addition, use of a service landing within an existing harvest unit on the Lolo National Forest has been approved by the Plains/Thompson Falls Ranger District of the Lolo National Forest (PF TRANS-02).

2.2. Implementation Features Related to Resources

Activities were designed to accomplish project objectives without significantly impacting resources in the Jo-Cat Resource Area. The following are specific guidelines that would be followed during implementation. Refer to the appropriate Specialist's Report for additional discussion of these features.

Specific Features of the Selected Alternative Related to Fire and Fuels Management

After harvest is complete, a fire/fuels specialist and silviculturist will assess fuel conditions in the units and determine whether prescribed burning can be implemented safely and effectively without further fuels treatment, such as slashing or leave tree protection. Prescribed burning will only occur when soil moistures are above 25 percent. Approximately 5-10 percent mortality of overstory trees is anticipated in treated stands as a result of prescribed burning. There is no intent to salvage this type of mortality in the project area. The trees will be retained to provide wildlife habitat and as a source of nutrients.

Specific Features of the Selected Alternative Related to Vegetation Management

A site-adapted species/seed source will be utilized in all regeneration areas scheduled for planting. Site preparation, fuel treatment, and tree planting will occur within five years of harvest. Site preparation and/or fuel treatment may include a combination of slashing, pruning, prescribed burning or grapple piling, depending on post-harvest conditions that meet both site preparation and hazard reduction objectives.

The largest and healthiest white pine will be retained consistent with White Pine Leave Tree Guideline requirements (PF Doc. VEG-R58). Although efforts will be made to retain the scattered old relic western larch trees within the Resource Area where feasible, some will likely be lost due to road and landing locations and possible safety needs on a tree-by-tree basis.

There are no known occurrences of Threatened or Endangered plants in the Jo-Cat Resource Area. Known Sensitive plant populations in the Resource Area will be protected to ensure that activities do not contribute to the decline of the species or the need for federal listing. Should additional rare plants be located during implementation, one or more of the following protective measures would be implemented: 1) drop the proposed unit from activity; 2) modify the proposed unit or activity, 3) implement appropriately designed buffers, and/or 4) implement Timber Sale Contract provisions for Protection of Endangered Species, and Settlement for Environmental Cancellation.

Prescribed fire **ignition** will not occur within riparian habitats, although fire will be allowed to burn **into** riparian areas. Higher fuel moistures in riparian habitats during prescribed burning conditions would likely limit the spread of any prescribed fire.

Noxious weed prevention strategies on the Coeur d'Alene River Ranger District are conducted based on the Noxious Weeds Final Environmental Impact Statement and Record of Decision (USDA Forest Service, 2000; PF Doc. CR-028, 029). Measures to protect Threatened, Endangered and Sensitive plant population viability and habitat capability during noxious weed treatment will be implemented following guidelines provided in that document. To help reduce the spread of noxious weeds and prevent the introduction of new invader species, a contract clause related to equipment washing will be used in all construction and timber sale contracts. The timber sale contract will require the purchaser to seed and fertilize skid trails, road cuts and landings. This will also include the seeding of the running surface of the new construction and reconstructed roadways after final blading. Forest Service roads within the project area will be monitored for noxious weeds during the post harvest period and treated as needed.

Specific Features of the Selected Alternative Designed to Protect Aquatic Resources

All activities will be designed to protect water quality and aquatic resources through the use of Best Management Practices (BMPs), which are the primary mechanism to enable the achievement of water quality standards. Forest Service Handbook 2509.22 (Soil and Water Conservation Handbook) outlines BMPs that meet the intent and are used in conjunction with the water quality protection elements of the Idaho Forest Practices Act.

Areas of ground disturbance will be seeded and fertilized. The road system into the area will contain design features which will allow this road to be closed without needing continual maintenance. Existing stream channel crossings will be reconstructed to install French-drain rock fords which will reduce mass failure potential and allow drainage across the roadway without erosion. Rolling dips will be designed into the new road construction to minimize erosion potential. Waterbars will be installed on the road at conclusion of use and the running surface of the road would be seeded and fertilized.

In development of the Selected Alternative, standards and guidelines of the Inland Native Fish Strategy (USDA Forest Service, 1995, pages A-6 through A-15; PF Doc. CR-003) were used specifically to protect water and aquatic biota within the Resource Area with application of streamside buffers. If Threatened or Endangered fish species are located during project implementation, protective measures will be implemented in compliance with the Inland Native Fish Strategy.

All known or discovered wetlands, seeps, bogs, elk wallows and springs within treatment areas that are less than one acre in size will be protected with a 100-foot "no activity" buffer as prescribed by the District Botanist.

Features of the Selected Alternative Designed to Protect Soils

The following practices are designed to minimize the detrimental impacts of soil compaction, displacement, severe burning, and nutrient and organic matter depletion on long-term soil productivity. The use of these practices would insure that the soil quality standards listed in the Forest Plan and Regional Soil Quality Standards would be met. For Best Management Practices, refer to the Specialist's Report on Aquatic Resource.

Where present, existing skid trails would be used. All new skid trails would be designated and laid out to take advantage of topography and minimize disruption of natural drainage patterns. Where terrain is conducive, trails

would be spaced at least 100 feet or more apart. Mechanized felling and skidding would allow skid patterns to be closer provided slash mats are being utilized. Ground disturbance associated with skid trails would be seeded with the latest seed mix recommended at time of implementation.

The following are more specific requirements for individual units: Skid trails would only be permitted on the ridge in Unit 2a. Equipment would be required to remain on the road and winch material down for the remainder of the unit. The existing road that bisects Unit 5b would be incorporated into the skid trail design. Material harvested above this roadway would be required to skid down the road north to Road 6006 and not skidded through the main body of the unit. This would reduce compaction within the treatment area. If feasible, the old mining trail that crosses through Unit 11 would be incorporated into the skid trail pattern for Unit 11c. The old mining trail would be recontoured after harvest activities are completed if utilized.

The leading end of logs would be suspended during skyline yarding. No yarding across designated Riparian Habitat Conservation Areas would occur with this project.

The latest soil nutrient management recommendations from the Intermountain Forest and Tree Nutrient Cooperative (IFTNC) and Rocky Mountain Research Station would be applied to each activity area where vegetation is removed as appropriate. Lop and scatter of limbs and tops rather than whole-tree removal would be practiced. The "lop and scatter" technique would be used during intermediate (thinning) as well as final harvest (regeneration) operations. Slash would remain on site over-winter so that mobile nutrients such as potassium can leach from fine materials back to the soil. Subsequent jackpot burn or underburns would be "light" in nature.

Where slash is left untreated for nutrient recycling, determination of fire risk would be made by the district fire management officer. Where fire risk is considered high, especially near the Forest Highway 9 travel route, flexibility would be given to treat slash prior to it being left for 6 months.

Management of coarse woody debris and organic matter in all units would follow the USFS Region 1 guidelines. The majority of harvest units presently display satisfactory coarse woody debris levels, though portions of Units 10, 11, and 12 along the ridge line could benefit from additional material. Cull and breakage material during harvest activities would add to the existing down material. In addition, lodgepole removal units would require that 2-6 live or dead lodgepole pine be retained as well as most trees of other species. This would add to the coarse woody debris component over time.

The temporary road providing access to Units 12a and 12c would be re-contoured and seeded after completion of harvest activities.

Grapple piling equipment would operate on a slash mat and existing skid trails on slopes under 35 percent. Burn piles should be small and numerous rather than large and few.

Mechanized felling would be permitted in all tractor units and in helicopter/skyline Units 2, 5a, 11d, and 12c provided the slopes are 45 percent or less and equipment is walked on slash mats.

Underburning and pile burning in the harvest units would take place only when the upper surface inch of mineral soil has a soil moisture content of 25 percent. On south-facing dry site units, the prescribed burns should be done in spring-like conditions, when fuel and soil moisture would not result in a severe burn that could produce hydrophobic soils or eliminate the soil duff layer.

Features of the Selected Alternative Designed to Protect Wildlife Habitat

Western white pine and western larch of all sizes would be favored to retain on the site (especially those 18 inches or greater in diameter) unless removal is unavoidable due to safety reasons or special circumstances.

Road 6006 into the area would be gated during timber sale operations and closed by the timber sale purchaser at the end of daily activities. This route is not currently available to the public and would remain closed, except for administrative purposes. At conclusion of purchaser operations, an earthen barrier would be installed behind the gate. At the conclusion of post-sale burning and planting operations (not to exceed five years), the new construction between the Forest Highway 9 approach and the reconstruction would be recontoured and the talus slope above unit 7 would be pulled (approximately 150 feet) across the roadway. The temporary road would be recontoured following harvest activities.

Incidental trees charred during prescribed burning operations would be retained on site, providing black-backed woodpecker habitat. Any larger concentrations of burn mortality would also be retained unless additional NEPA analysis, disclosure, and documentation are done.

Only selected high mortality areas are being treated with this proposal. This would provide areas of snag concentrations after treatment. Lodgepole removal and salvage units all have small concentrations of snags outside of the unit boundaries that would not be salvaged. Within lodgepole removal units, 2 to 6 live or dead

lodgepole pine trees would be left per acre. This is in addition to the residual overstory component of other species that is not included in the harvest prescription. All dead trees that do not meet sawlog merchantability would be left standing within western larch thinning units, unless needed to be felled for safety reasons. Prescribed burning treatments would add to the snag component in the short term and residual live trees would be available for snag recruitment over the long term. Snags across the resource area would be retained to meet the Northern Region (Region 1) Snag Management Protocol (PF Doc. VEG-21, WL-28, WL-29, and WL-43). Snag retention would not be an objective or requirement within hand fuels treatment areas along Forest Highway 9.

If any Threatened or Endangered wildlife species are observed in the resource area during implementation, the district wildlife biologist would determine any project modifications necessary under the timber sale contract provisions to protect the species and its habitat based on applicable laws, regulations and management recommendations for the species. If any Threatened, Endangered or Sensitive species is found to be nesting in an area scheduled for prescribed fire or silvicultural manipulation, activities would be delayed in the area as recommended by the wildlife biologist.

Features of the Selected Alternative Designed to Protect Recreation Facilities

Forest Trail #7 runs through the eastern portion of the Resource Area. This trail is the upper boundary of unit 2 and runs through a portion of Units 4, 5, and 6. This trail would be considered a protected improvement under the timber sale contract. The purchaser would be required to repair any damage to the trail tread and remove any logging slash off of the trail. Repair of the trail tread would require the use of hand tools. The machine fireline separating Units 5 and 6 would not cross the trail. Hand line would be used above the trail if needed. Since trail use is generally low, the trail would be closed during the week when felling or yarding activities are within 200 feet of the trail or when logs are being flown across the trail. This closure would only be permitted on weekdays and the trail would be re-opened to the public for use on weekends and holidays. Since the trail is only affected by a small portion of the treatment area, this closure period is expected to be short duration. Other trail routes are available in the Thompson Pass area, so impact to the public is expected to be minor.

Forest Highway 9 from Murray to Thompson Pass is often groomed during the winter months for snowmobile usage, even though it is not an established groomed route recognized by the Forest Service. To provide for this use, logging operations would be prohibited from December 15 to March 1 unless otherwise agreed. This restriction period has been shortened since county and state officials often try to keep this route into Montana open as long as possible and re-open as early as economically feasible. No grooming occurs on the Montana side of the Forest Highway during winter months.

No activities would be scheduled within the Maple Peak Roadless Area. Lodgepole pine mortality within the roadless area would be retained for woodpecker habitat and future denning habitat for lynx. Prescribed burning activities adjacent to the roadless area may result in fire burning into the roadless area, however it is not expected to encroach more than several hundred feet.

Features of the Selected Alternative Designed to Protect Heritage Resources

Surveys to locate heritage resources within the Jo-Cat Resource Area have been completed (PF Doc. HR-01). All known heritage resource sites would be protected under any action alternative, as directed by the Cultural Resources Management Practices (Forest Plan, Appendix FF; PF Doc. HR-01). Any future discovery of heritage resource sites would be inventoried and protected in accordance with the National Historic Preservation Act if found to be of cultural significance.

2.3. Schedule of Activities Under the Selected Alternative

Depending upon availability of funding and operating schedule, timber harvest will likely occur in 2008 and 2009. Prescribed fire fuels treatments in 2010 and 2011 with planting in 2012.

2.4. Mitigation Measures That Will Be Required to Occur Under the Selected Alternative

Approval has been given by Shoshone County to use a turnout along Forest Highway 9 as a log landing (Appendix C - Treatment Area Map). The following measures would need to be incorporated *if* that landing is used. The landing area is small, so only logs from Units 12d and 13 would be permitted to be flown to this landing. Straw bales would be placed along the Prichard Creek side of the landing to catch any sediment movement. No adjacent coniferous trees would be cut. Approximately four to six cottonwood trees (10 to 12 inches in diameter) would be permitted to be cut for safety. All landing slash would be required to be hauled and not burned on site. Flaggers would be required to control traffic flow on Forest Highway 9 to provide for public safety. Since a small part of this turnout is still on private ownership, additional approvals and measures may apply before use would be granted.

Elsewhere, analysis of proposed activities indicate potential effects that are well within applicable regulatory thresholds (for example, those identified by the Forest Plan, Endangered Species Act, Clean Water Act, etc.); therefore no mitigation measures were identified as necessary to reduce effects to natural resources or the human environment. Refer to the EA (Chapter 3) and the Specialist's Reports for more discussion of effects.

2.5. Implementation and Effects Monitoring

The Forest Plan documents a system to monitor and evaluate Forest activities related to timber, visual resources, recreation, cultural resources, wildlife, water/fish, Threatened and Endangered species, minerals, lands and environmental quality (Forest Plan, Chapter IV, pages IV-10 through IV-12; PF Doc. CR-002). For example, sale administrators and other contracting representatives would monitor all timber sales to ensure that activities are conducted in accordance with contract specifications (that activities occur where and when they should to protect resources such as soils and wildlife, that yarding is accomplished as planned and specified in the contract to protect soils, that seedlings are planted at the appropriate spacing, etc.). Reforestation success in regeneration areas would be monitored until the District silviculturist certifies that stocking requirements are met.

In addition, BMPs would be incorporated into many different phases of the project. The district hydrologist would review the design of all proposed roads and all road maintenance to assure compliance with BMPs. The engineering representative and the district hydrologist would monitor all new construction, reconstruction and temporary roads to ensure that they were built or restored to specifications. A sale administrator would visit each active cutting unit at a frequency necessary to assure compliance with the BMPs and the timber sale contract. Minor contract changes or contract modifications would be agreed upon and enacted, when necessary, to meet objectives and standards on the ground. Monitoring of BMPs has determined that recent projects on the IPNF have been implemented as designed and have achieved the desired objectives (IPNF Monitoring Reports for 2004 [pp. 37-44, 60; PF Doc. CR-026], 2003 [pp. 41-46, 76-77; PF Doc. CR-022], 2001 [pp.27-40; PF Doc. CR-017], and 2000 [pp. 34-41, PF Doc. CR-016]). Additional information on monitoring is provided in the Specialist's Report on Aquatic Resources (Appendix C).

2.6. Synopsis of Cumulative Effects

Limited past activity has occurred in the Jo-Cat Resource Area. This is likely explained by the loss of the timber resource during the 1910 fire. Some salvage effort may have occurred after the fire, but there are no records to support this possibility. This area did not provide much commercial timber interest until later in the century since the timber component was smaller second-growth. Only as the timber stands in this area have grown, and the timber industry has moved toward utilization of smaller diameter logs, did commercial timber harvest become a possible management tool for this area. The Heritage Resource Report also provides some explanation for the limited past activity, in that a considerable part of the bedrock formations in the resource area are not typically associated with mineral deposits and this is revealed by the lack of heritage resources (PF Doc. HR-1).

Some testing for mineral presence occurred in the late 1960's. This testing created the existing road system in the Resource Area and the construction of scattered dozer trails and test excavations. No further mining development occurred. The route of Forest Highway 9 through the Jo-Cat Resource Area has been in place since the early mining days in the Prichard Area (PF Doc HR-1). This roadway was recently reconstructed in the mid 1990's. The reconstruction of the roadway removed approximately 24 acres of timber with the right-of-way clearing on National Forest lands. A fire occurred in the lower reaches of Cat Creek in the 1970's. Approximately 30 acres burned on private ownership and approximately 13 acres on National Forest lands within the Resource Area. Another 28 acres burned outside the Resource Area on private lands during this fire event. It is believed that the private timber was harvested before the fire. No salvage occurred on NF lands. Approximately 30 acres of select harvest occurred on private ownership north of Forest Highway 9. Past mining activity occurred in Paragon Gulch but most of that activity was on the west side of the creek. Only an unnamed prospect in upper Paragon and a fenced ridge-top mine shaft on the resource area boundary are within the Jo-Cat Resource Area (EA, page A-7).

The Jo-Cat Resource Area is located in the headwaters of the Prichard Creek drainage. To provide a more cumulative assessment of the project in relation to its location, a listing of additional activities that have occurred in the Prichard Creek drainage is provided. These activities are for Prichard Creek above its confluence with Eagle Creek. A discussion of past management activities on lands in the Resource Area and the watershed cumulative effects area is provided in EA - Appendix A, followed by the effects on key resources (fire/fuels, vegetation, aquatics, soil, and wildlife).

Prichard Creek has a substantial history of mining. Mineral exploration work in the Prichard Creek area began shortly after the gold rush to Murray in 1885. Extensive dredge mining for placer gold occurred in the main channel and its tributaries. After the discovery of gold, ore milling sites were established. Past mining activities

altered the flow regime, disrupted natural bedload movement and altered fish habitat condition in much of Prichard Creek and its side drainages. Dredge mining totally altered channel condition causing instability removing large wood and reducing fish habitat quality and quantity within the areas of placer mining. Where placer mining occurred most of the vegetation was removed, altering large wood recruitment to the channel and negatively affecting channel condition and fish habitat conditions. Hard rock mining constructed roads into side drainages, often running along steamcourses. Ore milling sites produced both jig and floatation tailings, which have added sediment and elevated the levels of heavy metals in Prichard Creek. Mine cleanup work such as reclamation of the Paragon and Monarch mill sites has reduced loadings of heavy metals into the creek. This will have long term benefits to aquatic resources in the affected areas.

There are no ongoing or reasonably foreseeable projects within the Jo-Cat Resource Area. The ongoing and reasonably foreseeable projects are located in the watershed cumulative effects area downstream from the Jo-Cat Resource Area. A portion of the Prichard/Murray HFRA Project is located within the cumulative effects area. This project will provide fuels reduction treatments near the Prichard and Murray areas. This will help to reduce potential fire intensities in these areas over the long term. Effects to the water quality and aquatic habitat have been shown, through preliminary analysis, not to be measurable within the Prichard Creek watershed with this HFRA project. Restoration activities within the Prichard Creek watershed over the last ten years have been shown to reduce sediment in compliance with the North Fork sediment TMDL. Additional activities, such as approximately 100 acres of harvest treatment on BLM lands near Murray, 249 acres of harvest treatment using helicopter yarding on private lands in Bear Gulch, State DEQ mine reclamation activity on private property in Bear Gulch, and placer mining and exploratory drilling in Butte Gulch are also scheduled to occur. See EA – pages A-14 and A-15 for more information.

The Jo-Cat Resource Area is located in the headwaters of Prichard Creek. The project was designed to not detrimentally affect the watershed, threatened and endangered species, wildlife habitat, or other resources in conjunction with ongoing and reasonable foreseeable activities.

3. Decision Rationale

I have selected the Proposed Action as the Selective Alternative based on the three criteria identified in section 1.4, and discussed below. The three criteria are:

- *the extent to which the alternatives address the purpose and need*
- *the effects of the alternatives on other resources*
- *consistency with the goals and findings of Forest policy and legal mandates*

3.1. Extent to which the Alternatives Meet the Purpose and Need

Of the alternatives considered, the Selected Alternative best addresses each of the three needs identified for the Jo-Cat Resource area in compliance with goals of the Forest Plan, the National Fire Plan, and the Shoshone County Fire Mitigation Plan, and direction provided by the Interior Columbia Basin Ecosystem Management Project, the Northern Region Overview, and the Coeur d'Alene River Basin Geographic Assessment. The Selected Alternative would accomplish this without significantly impacting aquatics, wildlife, scenic, or other resources, as described below and in Section 3.2 and Section 4.

Purpose and Need 1 of 3: To recover a portion of the timber value that is being lost and projected to be lost, to the mountain pine beetles currently attacking this area.

Of the alternatives considered in detail, the Selected Alternative is the only one that responds to this need. The No-Action Alternative would not recover any of the timber value being lost or projected to be lost to mountain pine beetles, because no timber harvest would occur. Valuable sawtimber and houselog quality material would not be made available to local markets to help meet the demand for forest products. This material would deteriorate over the next several years and opportunities to recover the timber value would be lost. Local timber demands may need to be met by harvesting green healthy trees from other sources instead of utilizing a component of dead and dying timber.

The Selected Alternative will recover a substantial portion of the timber value being lost or projected to be lost to mountain pine beetles. A considerable portion of this material is already dead. Therefore there is urgency in recovery of this material. Based on the estimated minimum bid that will be accepted, the sale will generate enough funds to pay for reforestation and fuels reduction activities under this project. The Selected Alternative will salvage existing dead and infested lodgepole pine trees and harvest live lodgepole pine from stands with

moderate to high risk of becoming infested over the next several years. This treatment will also harvest lodgepole pine in smaller size classes within selected treatment areas. This smaller component, though at low risk of beetle mortality, is mature and stagnated and would not put on additional growth after larger trees are removed. A mosaic of openings will be created which would provide forage habitat for lynx and other big game species. A component of long-lived seral species will be introduced into these openings to provide more options for future management. Valuable sawtimber and houselog quality material will be made available to local markets to help meet the demand for these forest products and which may reduce pressures to cut green healthy timber to meet this demand. These treatments will reduce future fuel loadings which could lead to a high-intensity wildfire which could damage other resources in the project area.

Purpose and Need 2 of 3: To promote the existing healthy western larch component where it exists on this landscape.

Of the alternatives considered in detail, the Selected Alternative is the only one that responds to this need. The No-Action Alternative would not respond to this need, because no activities would occur to reduce crown and moisture competition with the western larch component. Continued ingrowth of other species would lead to slower growth of the western larch component and will lead to a considerable amount being overtopped and eventually lost to the future stand structure. The No-Action Alternative would not reduce stocking levels leaving stands at risk of high-intensity wildfire that could consume a considerable component of the healthy larch. The No-Action Alternative would not create conditions that would favor western larch stands reaching old forest structure that could be sustainable over the long term.

Under the Selected Alternative, commercial thinning harvest activities will promote the existing western larch component on the landscape and enable western larch stands to reach an old forest structure stage that could be sustainable over the long term. Reducing stocking levels in these stands, followed by prescribed fire treatment, will reduce the risk of high-intensity wildfire that could consume a considerable component of the existing healthy larch.

Purpose and Need 3 of 3: To reduce potential fire intensities while maintaining the general visual character along the fire escape travel corridor within this project area.

Of the alternatives considered in detail, the Selected Alternative is the only one that responds to this need. The No-Action Alternative would not respond to this need, because no activities would occur to reduce current fuel loadings below this transportation route. Existing ladder and ground fuels may continue to support an intense crown fire close to the roadway which may not allow for emergency travel along this corridor during a fire event.

Under the Selected Alternative, limited commercial thinning (Unit 16) and prescribed fire activities in conjunction with selected non-commercial thinning, hand piling and burning treatments will reduce current fuel loadings below Highway 9. This will reduce current crown densities and raise crown base heights to reduce fire intensities coming up to this roadway. This route has been identified by the Shoshone County Fire Mitigation Plan as an ingress/egress travel corridor in the event of a fire in the Prichard/Murray area (PF Doc. FF-02).

3.2. Effects of the Alternatives on Other Resources

Since the No-Action Alternative does not propose any management activities in the Jo-Cat Resource Area, there would be no direct effects to resources in the area. However, changes are constantly occurring over time. The long-term effects of not responding to current conditions in the area will likely mean greater adverse effects with the occurrence of natural events, such as a major wildfire. Activities under the Selected Alternative will not pose any significant short- or long-term impacts, and the treated areas would be better able to handle major events in the future, which helped in my decision to select the Proposed Action for implementation.

The purpose and need discussed earlier addresses the effects on forest vegetative and fire/fuel conditions; the following compares the effects of the alternatives on other resources.

Effects to TES Plants

Under the No-Action Alternative, there would be no direct effect on any Sensitive or Forest Species of Concern (FSOC) plants. There would be an increased risk to sensitive plants and habitat due to the increase in fuel loads from insect mortality and through time with continuing fire suppression. The increase in ignition risk and a resulting fire would also have an array of likely effects for sensitive plant species, ranging from beneficial to intolerant. Additional discussion of how herbaceous plants respond to fire is provided in the Specialist's Report on TES Plants. Cumulative effects to alpine/subalpine forest would be low to moderate. Impacts resulting from recent insect activity could include high-intensity, duff-replacing wildfires from predicted high fuel loadings in untreated areas. Some disturbance to rare plant species in this guild may be beneficial as they tend to favor

more open disturbed sites. However, populations could be destroyed if such a fire were intense enough. Cumulative impacts to wet and moist forest habitat would be low.

Under the Selected Alternative, activities would directly impact individual Naked Mniium moss plants (sensitive plant species) that occur on Road 6006, but the portion of the population in Cat Gulch and associated habitat would not be affected. The ample amount of suitable habitat in the drainage would provide for the continued existence of this species. While there would be direct and indirect effects to rare plant habitat, potentially suitable habitat for rare plants would gradually be improved. Rare plant surveys were completed and design features are in place to project rare plant populations. There would be no effect to threatened or endangered plants with the selected alternative. *For more information, please refer to the EA (Section 3.E) and the Specialist's Report on TES Plants.*

Effects to Aquatics

Under the No-Action Alternative, there would be no direct or indirect effects to aquatic resources since no activities would be implemented. Water yield and peak flow values would continue to decrease very slowly (by an average of about 1%) for the next 25 years as vegetation recovers from past harvest. Past harvest within the resource area on National Forest lands has been very limited. Sediment yield values and trends would not change from existing predicted trends.

Under the Selected Alternative, treatment activities would have little to no risk of measurable effects to the magnitude, intensity, or duration of peak flows and sediment yields. The risk of stream channel changes would be low to none (p. EA-35). New road construction is located high on the slope away from drainages. Road reconstruction features would reduce the risk of failures at stream channel crossings. Salmonid redds, aquatic life, and associated habitat would not be affected by the anticipated changes in conditions (p. EA-35). The Selected Alternative may affect individual westslope cutthroat trout, but would not lead toward a trend in federal listing. The Selected Alternative would have no effect to bull trout or to designated critical bull trout habitat in the lowest most reaches of Prichard Creek. There would be no effect to white sturgeon. *For more information, please refer to the EA (Section 3.F) and the Specialist's Report on Aquatic Resources.*

Effects to Soils

Under the No-Action Alternative, there would be no new management induced detrimental soil impacts in the Jo-Cat Resource Area. Stands currently at high mortality risk would not be treated, which may increase associated risks of stand loss due to wildfire, severe burning, erosion concerns, and loss of soil nutrients. No direct effects to the soil resource would occur with No Action since there would be no road construction, logging, or fuel treatment activities (PF Doc. SR-06, page SOIL-10). There would be no compaction or displacement beyond what currently exists.

Under the Selected Alternative, the EA documents beneficial effects of implementing activities that would reduce the potential of severe wildfire effect on soils, because there would be a reduction in the amount of fuels on treated sites (p. EA-39). Soil-disturbing activities would occur but would not exceed Regional or Forest Plan standards (PF Doc. SR-06, pages SOIL-8, SOIL-17). *For additional information, refer to the EA (Section 3.G) and Specialist's Report on Soils.*

Effects to Wildlife

The wildlife analysis considered effects to 8 species, including Canada lynx, gray wolf, black-backed woodpecker, wolverine, pileated woodpecker, pine marten, northern goshawk, and Rocky Mountain elk (EA, Section 3.H). The Forest Service has developed a conservation assessment of the northern goshawk, black-backed woodpecker, flammulated owl and pileated woodpecker in the Northern Region (Samson, 2005; PF Doc. WL-67). The conservation assessment shows that short-term viability (less than 100 years) is not an issue in Region 1 for these species. Because habitats are trending away from historic range, long-term viability (more than 100 years) is low.

Under the No-Action Alternative, there would be no direct or indirect effects to these species because no activities are proposed. Over the long term, habitat could improve for some species, depending on whether a stand-replacing fire occurred in the area. For example, such a fire could create forage habitat for species such as lynx, black-backed woodpeckers, and elk; set back the positive trend in habitat for fisher, pileated woodpeckers, and pine marten.

Under the Selected Alternative Effects to species vary - habitat conditions that favor one species may be detrimental to another. However, specific design features of the Selected Alternative would minimize the impacts to any given species in the Jo-Cat Resource Area (pp. EA-39 through EA-41; Wildlife Specialist's Report, Section 3), and there will be no loss of viability to populations or species. There are no activities proposed in allocated old

growth. There would be no effect to the bald eagle or grizzly bear with the Selected Alternative. The Selected Alternative may affect but would not adversely affect the gray wolf or Canada Lynx or their survival. The Selected Alternative may impact individuals or habitat, but would not likely contribute to a trend toward federal listing or cause a loss of viability to the population or species for the black-backed woodpecker, wolverine, northern goshawk, pileated woodpecker or pine marten. Elk habitat potential would drop 2% during activities but would return to pre-existing conditions after closure activities. *For additional information, refer to the EA (Section 3.H) and Specialist's Report on Wildlife.*

Effects to Recreation

Under the No-Action Alternative, there would be no short- or long-term direct or indirect effects to recreation opportunities, settings or facilities. Travel along the Stateline Trail would continue as presently managed. Fire risk in the Jo-Cat Resource Area is increasing due to widespread beetle mortality. In the event of a large-scale fire, the trail could be burned over. The Maple Peak Roadless Area would not be affected.

Under the Selected Alternative The Selected Alternative would have only temporary impacts to recreation (short term closures, noise, and smoke, could impact recreation experiences in the area). Features designed into the project would reduce impacts along Trail #7. Over the long term, there would be less risk to recreation in the area as a result of wildfire, since the intensity of potential wildfires would be reduced following treatment (p. EA-42). Integrity and manageability of the roadless area boundaries would be unchanged (p. EA-41; Specialist's Report on Recreation, page REC-3). *For additional information, refer to the EA (Section 3.I) and the Specialist's Report on Recreation.*

Effects to Scenery

Under the No-Action Alternative, there would be no direct or short-term effects to the scenic condition of the area because no activities are proposed. Beetle mortality is evident with numerous large patches of red trees. This red appearance is not the expected green background appearance when looking across the forest terrain. This would likely continue for several years. Eventually, as mortality declines and needle shed occurs, the green background vegetation becomes more apparent. Large concentrations of dead trees may give the general appearance of unhealthy forest conditions. Over the long term, increasing vulnerability to wildfire in the area may bring detrimental changes to the scenic conditions.

Under the Selected Alternative Under the Selected Alternative, most changes would be in the middle and background views and generally would fit well with the surrounding landscape. Forest Plan visual quality objectives would be met. Sections of Trail #7 would have visual changes, creating a more open character. Initially this would detract from the scenic view for several years but over time would provide more scenic diversity by creating views out of the dense timber (p. EA-43; Specialist's Report on Scenery, pages SCE-2, SCE-3). *For additional information, refer to the EA (Section 3.J) and the Specialist's Report on Scenery.*

3.3. Consistency of the Alternatives with the Goals and Findings of Forest Policy and Other Legal Mandates

All management activities under the Selected Alternative are in full compliance with the Forest Plan, National Fire Plan, and other Forest Service policies and legal mandates. Because the No-Action Alternative would not do anything to reduce potential fire intensity or to address forest pest problems, it would not meet all of the Forest Plan goals, objectives, and standards or with the objective of the National Fire Plan, but would be consistent with other legal mandates.

National Environmental Policy Act: The analysis for the Jo-Cat Resource Area project followed the guidelines of NEPA as provided by the Council on Environmental Quality (CEQ). Alternatives were developed based on existing conditions, Forest Plan goals and objectives, and public concerns and recommendations. A total of two alternatives were considered in detail (EA, p. EA-6, "Overview of Alternatives"), including a no-action alternative as required by NEPA. During alternative development, an additional four alternatives were briefly considered but eliminated from further study (EA, pages EA-17, 18). The range of alternatives is appropriate given the scope of the proposal and the purpose and need for action (EA, pages EA-2 through EA-5).

National Forest Management Act requirements related to vegetative manipulation and aquatic resource protection: Technology and knowledge exists to ensure that lands are adequately restocked within five years after final harvest. Effects on residual trees and adjacent stands have been considered (EA, p. 11, 12, 24, 25, 28, 30, 43, 45). Harvest will not occur on sites identified as not suitable for timber production. The Forest Plan (under Appendix M) indicates that on-site inspection may be used to revise timberland suitability. The Jo-Cat Resource Area project analysis included a detailed stand-by-stand review in the area of proposed treatment units

using data, field reconnaissance, photo interpretation, and professional experience (page EA-27; PF Doc VEG-17 and VEG-18). This review changed 588 acres from a status of “unsuitable for timber production” (Management Area 9) to “suitable” (Management Area 1).

All treatments that will occur under the Selected Alternative are silviculturally appropriate and are within the timber and vegetation management practices outlined in the Forest Plan (EA-31). Implementation of features of the Selected Alternative designed to protect aquatic resources (pages EA-12, 13) will meet the riparian management objectives of maintaining slope stability in potentially sensitive areas, and providing a long-term supply of large woody debris (page EA-36). These features surpass those required by the Idaho Forest Practices Act and are consistent with Forest Plan standards. Potential physical, biological, aesthetic, cultural, engineering, and economic impacts of the Selected Alternative have been assessed and are disclosed in the Environmental Assessment (Chapter 3) with supporting information in the Project Files.

Clean Water Act: The Specialist’s Report on Aquatic Resources evaluated potential adverse impacts to water resource and project compliance with the Clean Water Act, and determined that the Selected Alternative is consistent with the Clean Water Act (EA, Page EA-36; Specialist’s Report on Aquatics, p. AQ-29). Sediment and metals (the pollutants of concern) will not increase in the water quality-limited Prichard Creek drainage. In compliance with the current TMDL for the North Fork of the Coeur d’Alene River, project activities would not result in any net measurable increase in sediment or metals into the North Fork of the Coeur d’Alene River or streams of the resource area. There will be no change in risks to beneficial uses in any stream in the Jo-Cat Resource Area. The No-Action Alternative does not include any activities that would directly affect water resources.

Clean Air Act: The No-Action Alternative does not include any activities that would directly affect air quality. Based on past prescribed burning, activities of the Selected Alternative can be successfully implemented in accordance with the Clean Air Act (page EA-20). The IPNF is a party to the North Idaho Smoke Management Memorandum of Agreement, which established procedures regulating the amount of smoke produced from prescribed fire. The North Idaho group currently uses the services and procedures of the Montana State Airshed Group, which are considered to be the “best available control technology.”

National Historic Preservation Act: Both alternatives are consistent with the National Historic Preservation Act. Surveys to locate heritage resources within the Jo-Cat Resource Area have been completed (page EA-20). All known heritage resource sites will be protected as directed by the Forest Plan (PF Doc. HR-1). Any future discovery of heritage resource sites or caves will be inventoried and protected if found to be of cultural significance; a decision would then be made to avoid, protect or mitigate effects to these sites in accordance with the National Historic Preservation Act (page EA-20).

Migratory Bird Treaty Act: The No-Action Alternative does not include any activities that would directly affect migratory birds. Under the Selected Alternative, the habitat needs of neotropical migrants were addressed through the analyses for other species which depend upon old forest structure and snags (goshawk, pileated woodpecker, marten, and black-backed woodpecker) (pp. EA-40, EA-41; Wildlife Specialist Report, p. WL-18 through WL-21, WL-25 through WL-32, WL-A2). Efforts to trend stands in the resource area toward historic species composition and diversity in age structure and to maintain the ecological processes that created these conditions would eventually benefit nongame and land bird species.

Environmental Justice Executive Order: Executive Order 12898, issued in 1994, ordered federal agencies to identify and address the issue of environmental justice; i.e. adverse human health and environmental effects that disproportionately impact minority and low-income populations. The No-Action Alternative does not include any activities that would affect minority or low-income populations. Based on the composition of the affected communities and the cultural and economic factors, the Selected Alternative will have no adverse effects to human health and safety or environmental effects to minority, low-income, or any other segments of the population. Please refer to the Project Files, “Environmental Justice.”

Recreational Fishing Act: Executive Order 12962 (June 7, 1995) identifies objectives to improve the quantity, function, sustainable productivity, and distribution of federal actions on aquatic systems and recreational fisheries, and document those effects. The No-Action Alternative does not include any activities that would directly affect recreational fishing. The documentation provided in the Environmental Assessment meets the requirements of the Recreational Fishing Act. Information on the effects to aquatic resources shows that the Selected Alternative would have no measurable effect to the beneficial uses. Though individual westslope cutthroat trout may be affected, the project would not lead toward a trend in federal listing.

National Fire Plan: In 2000, over 92,000 wildland fires burned more than 7.5 million acres of grass, brush and forested lands across the United States. In response, the Secretaries of the Departments of Agriculture and the Interior developed an interagency approach to respond to severe wildland fires, reduce their impacts on rural communities, and assure sufficient firefighting capacity in the future. The “National Fire Plan” identifies five key

program areas designed to respond to the severe wildfires of 2000, to reduce their impacts on rural communities, and to enhance firefighting capabilities in the future. Because the No-Action Alternative would not take any action toward reducing fire danger, the No-Action Alternative would not be consistent with the goals of the National Fire Plan. In contrast, timber harvest and prescribed burning activities under the Selected Alternative is consistent with and meets direction provided in the National Fire Plan.

Interior Columbia Basin Ecosystem Management Project (ICBEMP): The Jo-Cat Resource Area is within an area identified by the ICBEMP as Forest Cluster 4, which emphasizes reducing risk to ecological integrity and species viability. The primary risks to ecological integrity within this Forest Cluster are risks to hydrologic and aquatic systems from fire potential, risks to late and old forest structures in managed areas, and risks in forest compositions that are susceptible to insect, disease and fire (EA, pp. 1-4). The No-Action Alternative would not take any steps to address these risks. Under the Selected Alternative, treatment activities in the Jo-Cat Resource Area will be consistent with Chapter 8 of the Integrated Scientific Assessment.

Northern Region Overview: Findings of the Northern Region Overview assessment conclude that there are multiple areas of concern in the Northwest Zone of the Region, but that "this subregion holds the greatest opportunity for vegetation treatments and restoration with timber sales. From a social and economic standpoint, using timber harvest for ecological restoration would be a benefit to the many communities which still have a strong economic dependency, more so than in other zones in the Region. Aquatic restoration should be focused on specific needs based on the zone aquatic restoration strategy." The timber management (timber harvest) tool best fits with the forest types in northern Idaho and is essential, for example, to achieve the openings needed to restore white pine and larch, and maintain upland grass/shrub communities. The No-Action Alternative does not propose any activities that would help address these areas of concern. The activities that will occur under the Selected Alternative are consistent with the findings and recommendations of the Northern Region Assessment.

Forest Plan goals and objectives: General management direction for the Idaho Panhandle National Forests is found in the Forest Plan, which provides Forest-wide goals and objectives (Forest Plan, Chapter II). The standards and guidelines for the Forest Plan (Forest Plan, Chapter II) apply throughout the Resource Area. I have evaluated features of the alternatives against Forest Plan goals and objectives, as well as the resource standards for consistency with the Forest Plan. Because the No-Action Alternative does not include any treatment activities, the continued succession of fuels and fire behavior characteristics and the perpetuation of forest pest problems would in time be inconsistent with the goals, objectives and standards established in the Forest Plan (EA, pages EA-25, EA-31). All management activities included in the Selected Alternative are in full compliance with and generally exceed Forest Plan goals, objectives and standards, including the Inland Native Fish Strategy amendment to the Forest Plan. For additional discussion of consistency with the Forest Plan, please refer to the discussions under each resource of concern in Section 4 of this Decision Notice (Finding of No Significant Impact) and in Chapter 3 of the EA (by resource).

Coeur d'Alene River Basin Geographic Assessment: The Geographic Assessment for the Coeur d'Alene River basin provides a description of the historic and current ecological, social, and economic conditions of the subbasin. The Geographic Assessment classifies the Jo-Cat Resource Area as a "Condition 3" landscape. Not to be confused with condition classes under the National Fire Plan, Condition 3 landscapes under the Geographic Assessment are in relatively good condition. They are mostly either large, unfragmented blocks that successfully regenerated from the fires earlier in the century, as is the case with the Jo-Cat Resource Area, or are higher elevation areas that have few problems other than fire suppression and the loss of whitebark pine. Road densities are generally low. The Geographic Assessment recommends maintaining large unfragmented blocks of vegetation in these areas to provide wildlife habitat and security that have the potential to provide future large blocks of mature/old forest. The Assessment also recommends maintenance of larch dominance in these areas. While the No-Action Alternative would maintain current unfragmented blocks of forest, there would be no activities to maintain the stands. The Selected Alternative is consistent with recommendations of the Geographic Assessment because treatments are designed to salvage lodgepole pine mortality that will not reach old forest structure and favors western larch dominance. Design features will provide for wildlife security over the long term. The Geographic Assessment further classifies the Prichard watershed as "not properly functioning" which contains aquatic resources that are degraded. These systems are not capable of fully supporting beneficial uses without management intervention and/or extremely long time periods. As designed, the Selected Alternative will not contribute to the degraded condition of the larger watershed.

4. Finding Of No Significant Impact (FONSI)

I have reviewed the direct, indirect and cumulative effects of the project activities as documented in this Decision Notice, the Environmental Assessment (Chapter 3 and Appendices), and the Project File. The setting of this proposal is in a localized area, with implications only for the landscape, drainages and stands in the analysis area. My consideration of the proposed action is based on its impact on the ecosystem, local communities, county, and the affected resource level. It does not have any large or lasting effect on society as a whole, the nation, or the state.

I find that there are no significant beneficial or adverse impacts on the physical, biological, or social portions of the human environment, and therefore an environmental impact statement was not prepared. The Selected Alternative is consistent with the management direction, standards, and guidelines outlined in the Forest Plan for the Idaho Panhandle National Forests

Significant impacts (both beneficial and adverse): Effects associated with the Selected Alternative are discussed in Chapters 2 and 3 of the Environmental Assessment. There will be no significant impacts to any resource under the Selected Alternative (EA, Chapter 3; and Project Files). The impacts are within the range of those identified in the Forest Plan. Project activities are limited to the specific vegetation and fuel treatments proposed on lands managed by the USDA Forest Service in the Jo-Cat Resource Area, although some analyses (such as aquatics and wildlife) considered the extent of effects beyond the project boundaries. While substantially treating timber stands with existing and projected mountain pine beetle infestation, improving stand conditions in western larch stands, and reducing hazardous fuels along a portion of Forest Highway 9, the Selected Alternative would not pose any significant short- or long-term effects. Design features included in this proposal would limit adverse effects to such an extent that any adverse impacts are almost undetectable and immeasurable, even at the local level (discussed in EA Section 3, and Specialists' Reports).

Fire/Fuels The EA documents beneficial effects of implementing activities under the Selected Alternative that would decrease future high fuels loadings in mountain pine beetle-infested lodgepole pine stands, promote fire resilience in western larch stands, and reduce fuels along Forest Highway 9 to reduce fire intensities along this egress/ingress travel corridor. Approximately 279 acres of fuel reduction treatments (15 percent of the resource area) would reduce potential flame lengths, torching, and crowning. This would create some desirable mosaics of vegetation in the resource area which can result in delayed fire spread and reduced fire intensity. Retention of some beetle-mortality areas for wildlife habitat would reduce overall effectiveness of fuels reduction treatments across the area, however most of these retention areas are higher in the basin and closer to major ridge lines that may slow fire runs. Though of some benefit at the scale of the resource area, this project would not affect existing fuel loadings or fire regime classes over the Coeur d'Alene Basin. For these reasons, there would be no significant beneficial, adverse or cumulative effects to the fire/fuels situation under the Selected Alternative. *For more information, please refer to the EA (Section 3.C) and the Specialist's Report on Fire/Fuels.*

Forest Vegetation The EA documents beneficial effects of implementing activities that would salvage dead and high-risk timber from lands to be managed for timber production. Activities would also commercial thin western larch stands to help promote and retain this long-lived seral species over the long term. Changes to forest composition and forest structure, though trending in the right direction, would only increase the long-lived seral composition by approximately 7 percent and favorably change stand structure by 4 to 5 percent at the resource area scale. While this change is advantageous for the Jo-Cat Resource Area, the change is such a small percentage of the Coeur d'Alene River Basin that no change would be reflected at the overall basin scale (pp. EA-28, EA-31; Specialist's Report on Vegetation, page VEG-13). For these reasons, there would be no significant beneficial, adverse or cumulative effects to forest vegetation under either alternative. *For more information, please refer to the EA (Section 3.D) and the Specialist's Report on Vegetation.*

- TES Plants** The EA documents beneficial effects of implementing activities that would trend vegetative conditions toward the desired future condition over the long term (p. EA-29, EA-31). While there would be direct and indirect effects to rare plant habitat, potentially suitable habitat for rare plants would gradually be improved. Rare plant surveys were completed and design features are in place to project rare plant populations. There would be no significant beneficial, adverse or cumulative effects to TES Plants under either alternative. *For more information, please refer to the EA (Section 3.E) and the Specialist's Report on TES Plants.*
- Aquatic Resources** Treatment activities would have little to no risk of measurable effects to the magnitude, intensity, or duration of peak flows and sediment yields. The risk of stream channel changes would be low to none (p. EA-35). New road construction is located high on the slope away from drainages. Road reconstruction features would reduce the risk of failures at stream channel crossings. Salmonid redds, aquatic life, and associated habitat would not be affected by the anticipated changes in conditions (p. EA-35). For these reasons, there would be no significant beneficial, adverse or cumulative effects to aquatic resources under either alternative. *For more information, please refer to the EA (Section 3.F) and the Specialist's Report on Aquatic Resources.*
- Soils** The EA documents beneficial effects of implementing activities that would reduce the potential of severe wildfire effect on soils, because there would be a reduction in the amount of fuels on treated sites (p. EA-39). Soil-disturbing activities would not exceed Regional or Forest Plan standards (Specialist's Report on Soils, pages SOIL-8, SOIL-17). For these reasons, there would be no significant beneficial, adverse or cumulative effects to the soils resource. *For additional information, refer to the EA (Section 3.G) and Specialist's Report on Soils.*
- Wildlife** The wildlife analysis considered effects to 8 species, including Canada lynx, gray wolf, black-backed woodpecker, wolverine, pileated woodpecker, pine marten, northern goshawk, and Rocky Mountain elk (EA, Section 3.H). Effects to species vary - habitat conditions that favor one species may be detrimental to another. However, specific design features of the Selected Alternative would minimize the impacts to any given species in the Jo-Cat Resource Area (pp. EA-39 through EA-41; Specialist's Report on Wildlife, Section 3), and there will be no loss of viability to populations or species. There are no activities proposed in allocated old growth. For these reasons, there would be no significant beneficial, adverse or cumulative effects to wildlife. *For additional information, refer to the EA (Section 3.H) and Specialist's Report on Wildlife.*
- Recreation** The Selected Alternative would have only temporary impacts to recreation (short term closures, noise, and smoke, could impact recreation experiences in the area). Features designed into the project would reduce impacts along Trail #7. Over the long term, there would be less risk to recreation in the area as a result of wildfire, since the intensity of potential wildfires would be reduced following treatment (p. EA-42). Integrity and manageability of the roadless area boundaries would be unchanged (p. EA-41; Specialist Report on Recreation, page REC-3). For these reasons, there would be no significant beneficial, adverse or cumulative effects to recreation. *For additional information, refer to the EA (Section 3.I) and the Specialist's Report on Recreation.*
- Scenery** Under the Selected Alternative, most changes would be in the middle and background views and generally would fit well with the surrounding landscape. Forest Plan visual quality objectives would be met. Sections of Trail #7 would have visual changes, creating a more open character. Initially this would detract from the scenic view for several years but over time would provide more scenic diversity by creating views out of the dense timber (p. EA-43; Specialist's Report on Scenery, pages SCE-2, SCE-3). For these reasons, there would be no significant beneficial, adverse or cumulative effects to scenery. *For additional information, refer to the EA (Section 3.J) and the Specialist's Report on Scenery.*

The degree of effects on public health or safety. Safety measures have been incorporated into the project design to provide for public safety during timber sale operations (EA-20, EA-43). In the event of a wildfire, the treatments below Forest Highway 9 would reduce fire intensities near the road to help allow safe travel along this ingress/egress travel corridor, which the Shoshone County Fire Mitigation Plan identified as a Secondary Resource Protection Zone (pp. EA-10, EA-11, EA-17, EA-24; Fire/Fuels Specialist Report, p. FF-14). The risk of smoke intrusion into Class I airsheds or non-attainment areas from prescribed burning in the Resource Area would be minimal due to distance and prevailing winds (PF Doc. FF-3). All burning complies with federal, state and local regulations (Fire/Fuels Specialist Report, p. FF-15). Management practices include but are not limited to burning under spring-like conditions (high fuel, soil, and duff moistures) to reduce emissions and provide for retention of large woody debris. Prescribed burning during spring or fall will generate less smoke than would occur during a much hotter stand-replacing summertime wildfire. For these reasons, there would be no significant effects on public health and safety.

Unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farms, wet lands, wild and scenic rivers, or ecologically critical areas: The Selected Alternative will have no significant effect on unique resource characteristics. Surveys to locate heritage resources within the Jo-Cat Resource Area have been completed. All known heritage resource sites will be protected as directed by the Cultural Resources Management Practices (Forest Plan, Appendix FF). Any future discovery of heritage resource sites or caves would be inventoried and protected if found to be of cultural significance. A decision would be made to avoid, protect, or mitigate effects to these sites in accordance with the National Historic Preservation Act of 1966 (page EA-20). No harvest activity will occur within the Maple Peak Roadless Area. The possibility of prescribed fire burning several hundred feet into the edge of the roadless area would not affect the roadless area attributes as fire is a natural part of the ecosystem.

The degree to which the effects on the quality of the human environment are likely to be highly controversial: As used in the Council on Environmental Quality's guidelines for implementing NEPA, the term "controversial" refers to whether substantial dispute exists as to the size, nature or effect of the major federal action rather than to the existence of opposition to a use (Perry, 1991; PF Doc. DN-4). Past monitoring has determined that actual effects of similar projects are consistent with estimated effects of the proposed activities. There is wide professional and scientific agreement on the scope and effects of these actions on the various resources, as cited in the discussion of effects to resources (EA, Chapter 3). Based on the findings of the analyses, the effects of the activities in the Jo-Cat Resource Area on the quality of the human environment are not highly controversial.

The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk: The planned actions are similar to actions implemented without significant impacts on the Coeur d'Alene River Ranger District and other districts of the Idaho Panhandle National Forests. Documentation of past successes with similar projects can be found in the IPNFs' annual monitoring reports (PF Doc. CR-004 through CR-018, CR-022). The analysis considered the effects of past actions as a frame of reference in conjunction with scientifically accepted analytical techniques, available information, and best professional judgment to estimate effects of the proposal on Fire/Fuels (pages EA-21 through EA-25); Forest Vegetation and TES Plants (pages EA-26 through EA-31); Aquatic Resources (pages EA-34 through EA-36); Soils (pages EA-36 through EA-39); Wildlife (pages EA-40 through EA-42); Recreation (pages EA-42, 43); Scenic Resources (pages EA-44, 45); and Finances (pages EA-46, 47). Design features will minimize the potential impacts. It is my conclusion that there are no unique or unusual characteristics of the area which have not been previously encountered that would constitute an unknown risk upon the human environment.

The degree to which the action may establish a precedent for future actions with significant effects or presents a decision in principle about future consideration: The Selected Alternative is not setting a precedent for future actions with significant effects. Management practices are consistent with the Forest Plan and with the capabilities of the land as documented in the EA, Chapter 3 discussions for Fire/Fuels (page EA-25); Forest Vegetation and TES Plants (pages EA-31, 33); Aquatic Resources (page EA-36); Soils (page EA-39); Wildlife (page EA-42); Recreation (page EA-43); Scenic Resources (page EA-45); and Finances (page EA-47). This action does not represent a decision in principle about a future consideration.

Whether the action is related to other actions with individual insignificant but cumulative significant impacts: The combined effects of past, other present, and reasonably foreseeable actions are discussed in the Environmental Assessment; there is no indication of significant adverse cumulative effects to the environment (EA, Chapters 2 and 3) with the activities identified in the Selected Alternative.

The degree to which the action may adversely affect districts, sites, highway structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historic resources: There are no features in the area that are listed or are being considered for listing on the National Register of Historic Places. All cultural resources would be protected (page EA-20). The potential for impacts to undiscovered sites is addressed by compliance with Forest Plan standards and guidelines, and through the use of standard timber sale contract provisions.

The degree to which the action may adversely affect an Endangered or Threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973: The Selected Alternative was designed to be implemented in a manner that would protect wildlife, fish, and rare plant resources in the Jo-Cat Resource Area (pp. EA-12, EA-14, EA-32 through EA-34, EA-39). No activities are proposed in allocated old growth. There would be no significant impact to any species, and there would be no loss of viability to populations or species. A Biological Assessment has been completed.

Whether the proposed action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment: The proposal meets federal, state and local laws for air and water quality, streamside management, riparian areas, cultural resources, and Threatened and Endangered species, and meets National Environmental Policy Act disclosure requirements as described in this Decision Notice and the Environmental Assessment (EA, Chapter 3, by resource).

National Forest Management Act and IPNF (1987) Forest Plan: The Selected Alternative is consistent with the NFMA and other applicable federal, state and local laws that protect the environment, including the IPNF (1987) Forest Plan, as amended. The activities proposed in the Jo-Cat Resource Area are consistent with the Forest Plan because they would salvage timber product from lands designated for such purpose, help promote long-lived, fire-resilient, seral species on the landscape, and reduce fire intensities along travel corridors. All proposed management activities would be in compliance with Management Area direction, including goals and objectives, as described in the Specialists' Reports.

Forest Plan old-growth standards would be met. The amount of allocated old growth within the Jo-Cat resource area is 32 acres or 1.5%. A detailed review of the old growth in OGMU 113 took place with this analysis. Forest Plan old growth standards/definitions were used (PF Doc. VEG-27, 28, 29, 38) and validation (PF Doc. VEG-4) included recent field exams, field reviews and 2004 photo interpretation. This review found that all previously allocated stands met old growth definitions (PF Doc. VEG-31, 32 and 34). In addition, 2 stands (one of which is in the resource area) not previously allocated, met old growth definitions and are now allocated (PF Doc. VEG-31 and 34).

Forest-wide analysis of old growth, which is disclosed in the 2004 Monitoring Report (PF Doc. CR-026), concludes that 12 percent of the IPNF is allocated old growth, with the Coeur d'Alene River Ranger District exceeding its' share of the allocated acres (PF Doc. SR-02, p. VEG-22). The Proposed Action does not include any harvest, prescribed burning, or road construction in any allocated old growth.

NFMA consistency requirements include the need to protect species viability and habitat for Threatened, Endangered, Sensitive Species as well as habitat for Management Indicator Species and forest species of concern. The Selected Alternative was designed to be implemented in a manner that would protect wildlife and fisheries resources in the Jo-Cat Resource Area (pp. EA-12, EA-14, EA-32 through EA-34, EA-39). There would be no significant impact to any species, and there would be no loss of viability to populations or species.

Technology and knowledge exists to ensure that lands are adequately restocked within five years after final harvest. Effects on residual trees and adjacent stands have been considered. Harvest will not occur on sites identified as not suitable for timber production. All treatments that would occur under the Selected Alternative are silviculturally appropriate and are within the timber and vegetation practices outlined in the Forest Plan. Potential physical, biological, aesthetic, cultural, engineering and economic impacts of the Selected Alternative have been assessed and are disclosed in the Environmental Assessment with supporting information in the Project Files.

5. Documents and Project Files

This Decision Notice summarizes analyses that have led to this point in the process. More reports and analyses documentation have been referenced or developed during the course of this project and are part of the Project Files. All project files for the Jo-Cat Resource Area project are available for review by the public. The project files may be reviewed at the Fernan Office of the Coeur d'Alene River Ranger District, or are available on compact disk upon request. To review the files, please contact the NEPA Coordinator at the Coeur d'Alene River Ranger District (Fernan Office), (208) 664-2318.

6. Appeal Rights and Implementation

This decision is subject to appeal pursuant to 36 CFR 215.11. A written appeal must be submitted within 45 days following the publication date of the legal notice of this decision in the *Coeur d'Alene Press* (Coeur d'Alene, Idaho) newspaper. It is the responsibility of the appellant to ensure their appeal is received in a timely manner. The publication of the data of the legal notice of the decision in the newspaper of record is the **exclusive** means for calculating the time to file an appeal. Appellants should not rely on date or timeframe information provided by any other source. Appeals must be submitted to:

USDA Forest Service, Northern Region
ATTN: Appeal Deciding Officer
P.O. Box 7669
Missoula, MT 59807

or

USDA Forest Service, Northern Region
ATTN: Appeal Deciding Officer
200 East Broadway
Missoula, MT 59802

(Office hours are from 7:30 a.m. to 4:00 p.m. Monday through Friday, except holidays.)

Electronic appeals must be submitted to:

appeals-northern-regional-office@fs.fed.us

In electronic appeals, the subject line should contain the name of the project being appealed. An automated response will confirm your electronic appeal has been received. Electronic appeals must be submitted in MS Word, Word Perfect, or Rich Text Format (RTF). It is the appellant's responsibility to provide sufficient written evidence and rationale to show why my decision should be reversed. The appeal must be filed with the Appeal Deciding Officer in writing. At a minimum, an appeal must meet the content requirements of 36 CFR 215.14 and include the following information:

- ✓ Appellant's name and address, with a telephone number if available;
- ✓ Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
- ✓ When multiple names are listed on an appeal, identification of the lead appellant and verification of the identity of the lead appellant upon request;
- ✓ The name of the project for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
- ✓ The regulation under which the appeal is being filed, when there is an option to appeal under either 36 CFR 215 or 36 CFR 251, Subpart C;
- ✓ Any specific change(s) in the decision that the appellant seeks and their rationale for those changes;
- ✓ Any portion(s) of the decision with which the appellant disagrees, and their explanation for the disagreement;
- ✓ Why the Appellant believes the Responsible Official's decision failed to consider the substantive comments; and
- ✓ How the appellant believes the decision specifically violates law, regulation, or policy.

An appeal will be dismissed if the preceding information is not included in the Notice of Appeal. If an appeal is received on this project, there may be informal resolution meetings and/or conference calls between the Responsible Official and the appellant. These discussions would take place within 15 days after the closing date for filing an appeal. All such meetings are open to the public. If you are interested in attending any informal resolution discussions, please contact the Response Official or monitor the following website for postings about current appeals in the Northern Region of the Forest Service: http://www.fs.fed.us/r1/projects/appeal_index.shtml. If no appeal is received, implementation of this decision may occur five business days from the close of the 45-day appeal-filing period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition. I am the Responsible Official for this decision. For more information regarding this project, contact Project Team Leader Bob Rehnberg or Ecosystems Staff Officer Sherri Lionberger at the Fernan Office of the Coeur d'Alene River Ranger District, (208) 664-2318.



RANDALL G. SWICK

District Ranger
Coeur d'Alene River Ranger District

MAY 1, 2007

Date

ATTACHMENT A

RESPONSE TO PUBLIC COMMENTS

Introduction

Three comment letters were received during the 30-day public review of the Jo-Cat Environmental Assessment (EA). The following table identifies the date of each letter, its' author, the organization(s) represented, and a brief synopsis of their letter. Substantive comments (paraphrased for brevity) follow, with our response. A copy of each letter in its entirety is provided at the end of this attachment.

Table A-1. Public Comment Letters Received During the 30-day EA Review Period.

Comment Letter Information	Synopsis
Letter #01, dated March 29, 2007, from Jeff Cook, representing Idaho Parks & Recreation (Boise, ID). <i>Mr. Cook also provided comments during scoping (see Project File Documents PI-10 and PI-11).</i>	Mr. Cook states that the EA adequately addresses their concerns regarding potential impacts to Stateline Trail #7. He also clarified that this trail is a component of the Centennial Trail system, which begins <u>on the Idaho-Nevada border</u> . There is no further response to his comments.
Letter #02, dated April 17, 2007, from Mike Mihelich, representing Kootenai Environmental Alliance (Coeur d'Alene, ID), The Lands Council (Spokane, WA), and WildWest Institute (Missoula, MT). <i>Mr. Mihelich also provided comments during scoping (see Project File Documents PI-12, PI-13).</i>	Mr. Mihelich raised concerns related to the roadless area, the Environmental Management Systems process, accurate analysis of the mountain pine beetle problem, cumulative effects to wildlife, mature trees, aquatics, and soils. Although he identifies several sources of information about pine beetles, he only specifically identifies two documents, still without pointing out why those documents are relevant to this project area. We have reviewed both papers and addressed their applicability as discussed in our response to his comments.
Letter #03, dated April 20, 2007, from Bradley Smith, representing Idaho Conservation League (Boise, Idaho). <i>Idaho Conservation League also provided comments during scoping (see Project File Documents PI-14, PI-15).</i>	Mr. Smith identified concerns related to permanent road construction, maximizing the use of prescribed fire rather than mechanical treatments (logging), snags and coarse woody debris to benefit wildlife, and regeneration of lodgepole pine stands. We have addressed his concerns in our response to comments.

1. Roadless Areas: The wolverine discussion does not address the issue of logging that may extend into the roadless areas directly adjacent to the logging units. Contradictory information in the EA regarding the number of logging units that are adjacent to the roadless area does not meet the NEPA requirements of 40 CFR 1500.1(b), requiring high quality information with expert agency comments.

Logging activities that would enter the Maple Peak Roadless Area is a controversial issue, especially given the September 20, 2006 United States District Court for the Northern District of California order. The project files need to include a copy of the December 21, 2006 letter from the Washington Office regarding Compliance with Court Order Injunctive Relieve for Roadless Area Management. (#02 Mihelich, pages 1,2)

None of the resource discussions address the issue of logging in the Maple Peak Roadless Area, because no activities are scheduled within the roadless area (pages EA-15, EA-17, EA-28, EA-43). An alternative was considered that would include harvest treatments within the Maple Peak Roadless Area, but it was eliminated from further consideration because potential delays would put the salvage objective at risk. Also, by not entering the roadless area, some mortality will be retained for wildlife habitat (p. EA-17).

The paragraph on page EA-43 was not intended to address all units adjacent to the roadless area, just those in which prescribed burning would occur. The Specialist's Report on Recreation stated it more clearly: "None of the proposed actions are within the boundaries of the Maple Peak Roadless Area. There is a possibility that burning operations for Units 8 and 15 would affect the IRA. There will be no fire lines constructed along the top of these units, which also happens to be the boundary of the IRA..Some low intensity fire could enter the IRA. It is expected that light fuels and natural fuel breaks would limit fire incursion to less than 200 feet distance. Fire and fuels management is fully compatible with management direction for an IRA. None of the seven wilderness-like attributes would be affected." (Specialist's Report on Recreation, p. REC-3).

To address these concerns that harvest activities could inadvertently cross over into the roadless area, there will be an increased number of boundary designation trees for units adjacent to the roadless area (Units 8, 9a, 9b, and 15), so that the boundary line will be very apparent. During the pre-work meeting for the timber sale contract

(required under C6.10 – Prewrite Conference [10/04]) the importance of the unit boundaries adjacent to the roadless area will be discussed, with the specific direction that no trees are to be cut from within the roadless area. In addition, the timber sale contract will contain provision C6.41# - Special Felling Requirements (10/04), which will require the purchaser to notify the Forest Service in advance of felling trees that are within 100 feet of the roadless area boundary in Units 8, 9a, 9b, and 15. The timber sale administrator will then be on the ground prior to felling and inspections will increase during this period.

The court order and Washington Office letter both address activities proposed within roadless areas, not adjacent to roadless areas. These documents are therefore not applicable to the Jo-Cat Resource Area, and are not part of the project files.

2. Environmental Management System (EMS): There is no discussion of EMS in the EA or Draft FONSI. What aspects of the EMS process have been used as part of this project and what aspects of EMS will be used if this project is implemented? Are there any Congressional goals that apply to this project? Have the Washington Office or Regional Forester issued new directives regarding implementing EMS in light of District Court rulings? Were any EMS audits conducted on the Coeur d'Alene River Ranger District in 2006? If one or more audits were completed, was any audit information applied to the Jo-Cat project? (#02 Mihelich, p. 2, 3)

The authority for implementing an Environmental Management System comes from the planning directives as well as Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management, January 26, 2007. This Executive Order requires Federal agencies to use an environmental management systems approach for improving environmental performance.

The IPNF EMS is a system to manage environmental impacts by focusing on how to improve our everyday work to reduce impacts when we are interacting with the environment by incorporating existing programs and procedures into a systematic approach. While this approach to managing the forest's environmental impacts can complement aspects of the NEPA process, it is neither a rule nor regulation requiring analysis or consistency finding disclosure in a NEPA document. The IPNF EMS is inclusive of the Jo-Cat project, however, it is not necessary for the project to reference or to design itself around the EMS. The EMS significant aspects point to the areas where operational controls and monitoring are to be followed. These operational controls are outlined in the NEPA document ("Implementation Features of the Proposed Action Alternative," pages EA-11 through EA-15), and subsequent procedures for conducting the project on the ground are outlined in current Forest Service Manual and Handbooks.

An EMS audit was conducted on the IPNF, including the Coeur d'Alene River Ranger District, in the fall of 2006. The audit sampled a number of planned and ongoing projects relative to the EMS significant environmental aspects (timber harvest, motorized travel and wildfire management) and evaluated whether the operational controls were in place and followed. The Jo-Cat project was not one of those projects sampled. Audit findings are summarized as to the Forest's conformance to the EMS Guide and the ISO 14001 Standards, thus the Audit report is not specific to a project-by-project set of findings.

Recent District Court rulings have not resulted in new directives regarding EMS implementation.

3. Insects and Diseases: The EA does not include high quality information from researchers, including entomologists that do not support the Forest Service's analysis of problems associated with mountain pine beetle attacks. Contrary analysis regarding pine beetle information can be found at www.davidsuzuki.org/Forests/Canada/BC/Beetle.

The EA does not contain a discussion of previous Forest Service logging operations in the mountain pine beetle areas that included stands where Armillaria or Annosus root rot diseases were present. The EA should have a summary of the Forest Service monitoring data that indicates whether the logging in stands with root rot diseases increased or decreased the incidence of mountain pine beetle attacks. Mr. Mihelich lists several items of information about the mountain pine beetle analysis (specifically temperature data) that were not included in the EA, and recommends the use of two publications: Western Pine Beetle (Demars, Jr. and Roettgering, 1982) and Root Diseases in Coniferous Forests of the Inland West (Forest Service General Technical Report RMRS-GTR-141).

Findings by Dr. Arthur Partridge (University of Idaho), Dr. Bill Romme (Colorado State University), and Dr. Tim Schowalter (Louisiana State University) do not support the FS contention mountain pine beetle attacks always require logging activities in order to protect ecosystems. (#02 Mihelich, pp. 3, 4)

Information used in the analysis was based on field reconnaissance by a certified silviculturist and experienced field foresters, technicians, and entomologists (p. EA-26 and the Specialist's Report on Forest Vegetation, p. VEG-4). Other data applicable to the mountain pine beetle included insect and disease aerial detection flight information and Forest Inventory Assessment data. Professional knowledge and experience with local silviculture, insects and disease conditions and outcomes as well as various silviculture, ecology, fire/fuels and insect and

disease references were also used (p. EA-26 and the Specialist's Report on Forest Vegetation, pages VEG-5, VEG-7, VEG-8, and VEG-28 through VEG-30).

Project Team Leader Bob Rehnberg researched the David Suzuki website, which states that the David Suzuki Foundation Forests program focuses on promoting sustainable logging and land-use practices in Canada's west coast temperate rainforests, and northern boreal forests. Key points of the website article are that logging won't stop the pine beetle; beetles are essential to forests; and clearcutting is not the solution. The purpose and need for this project is not to stop the pine beetle, rather it is to recover a portion of the timber value that is being lost to the mountain pine beetle infestation (pages DN-1, EA-2). There is no dispute that beetles can be a natural and important part of a healthy ecosystem at lower endemic levels (there are numerous references in the project files that refer to natural functions of mountain pine beetles in ecosystems; see Project File Documents VEG -R74 through VEG- R86). No clearcutting is proposed in the Jo-Cat Resource Area.

Mr. Mihelich does not indicate why the Western Pine Beetle publication (Demars, Jr. and Roettgering, USDA Forest Service, Forest Insect and Disease Leaflet 1, 1982) should be used for the mountain pine beetle analysis. The Western Pine Beetle reference, though providing somewhat relevant information, would not be specific to this project since mountain pine beetle is the causal agent in the project area, not western pine beetle. Western pine beetle does not successfully attack lodgepole pine. Even in that document, effects of cold temperatures are discussed as being only temporary and that after a few generations, the beetle population usually recovers.

Temperature is but only one environmentally influential factor that affects pre-and-post mountain pine beetle outbreaks. There is no temperature analysis that is required in order to confirm mountain pine beetle populations are at an epidemic level. There is no literature that we are aware of that supports such a statement where temperature alone confirms epidemic status. The Jo-Cat Resource Area has been in an outbreak status for some time now. There has been no indication that a slowing of the outbreak has occurred in the analysis area.

Mr. Mihelich does not cite any specific part of the publication "Root Disease in Coniferous Forests of the Inland West," so it is difficult to respond to his comment. This publication is included in the reference project files for the Specialist's Report on Vegetation (PF, VEG-R40). Disease trends are addressed in the Specialist's Report on Forest Vegetation (pages VEG-8, VEG-9). Root diseases, although present, are not currently a major cause of mortality in the Jo-Cat Resource Area (Specialist's Report on Forest Vegetation, page VEG-9).

Mr. Mihelich does not cite any specific publications by the three professors he identified. Regardless, nowhere in the EA is there any statement that mountain pine beetle attacks always require logging activities in order to protect ecosystems. As stated in the Purpose and Need section (DN-1, EA-2), the intent of the activities is not to protect the ecosystem from the mountain pine beetle attack, but to recover a portion of the timber value that is being or is projected to be lost to mountain pine beetles, to promote the healthy western larch component, and to reduce potential fire intensities along the fire escape travel corridor while maintaining the general visual character (DN-1, EA-3, EA-4).

4. Cumulative Effects: The cumulative effects discussion in Appendix A does not mention any wildlife issues associated with the Prichard-Murray project, the BLM project, or the private logging in Bear Gulch. There is no supporting data in the cumulative effects discussion to support the statement that there will be no loss of viability to population or species. (#02 Mihelich, p. 5)

There are no ongoing or reasonably foreseeable projects within the Jo-Cat Resource Area (EA, p. A-14). The "Ongoing and Reasonably Foreseeable Activities" discussion in Appendix A of the Environmental Assessment addresses activities within the watershed cumulative effects area. Although broadly stated, the effects to wildlife are addressed in Appendix A (pages A-14 and A-15) as applicable. For example, "Burning of landing piles associated with the Unknown King Bug timber sale would not have any measurable effect on other resources," including wildlife. "The pre-commercial thinning of past regeneration units in the cumulative effects area would generally not be measurable to other resources," including wildlife. "Some disturbance to wildlife would occur with the treatment and some increase in short term fire risk would also occur." In regard to the harvest in Bear Gulch, "Helicopter logging operations may disturb wildlife species in the surrounding area."

The wildlife analysis is done at different levels (ranging from coarse filter to fine filter) as appropriate to address issues and concerns relative to each species. The Specialist's Report on Wildlife disclosed direct, indirect and cumulative effects to wildlife and their viability, by alternative and species (Table WL-1 and Section 3, Affected Environment & Effects to Wildlife). For each species analyzed, the cumulative effects analysis area was based on the species' or guild's relative home range size, habitat unit, topographic features, and boundaries that represent the furthest extent of effects (Specialist's Report on Wildlife, p. WL-2). Generally, the geographic scope is the Jo-Cat Resource Area; however, due to species and habitat distribution, home range size, linkages between suitable habitats or between winter and summer range, distances of dispersal, and other variables, the analysis may include an area as large as northern Idaho or smaller than the Jo-Cat Resource Area (Specialist's Report on

Wildlife, p. WL-5).

6. Vegetation/Mature Trees: The project files need to include the stand number of the stands in one or more of the proposed logging units that include trees 16 inches and larger. (#02 Mihelich, p. 5)

Data summaries and copies of field data for examined stands in the treatment area provide that type of information (Project File Document VEG-37).

7. Sediment: The project files need to include the sediment routing data that has been generated as part of the sediment analysis and stream dynamics analysis for this project. (#02 Mihelich, p. 5)

Routed sediment is generated by the WATSED model (Project File Document AQ-57 [upper right hand side of spreadsheet, pages 7-11], and Document AQ-58 [upper right hand side of spreadsheet, pages 8-11]). Stream channel types and conditions that influence the stream dynamics are discussed in the Aquatics Specialist's Report.

8. WATSED: The analysis on page EA-36 does not include data from the WATSED model showing the expected tons of sediment per year that would be generated from the combined BLM, Prichard/Murray logging and private logging that likely would result in over 1,300 acres of logging activities in the wildlife cumulative effects analysis area. The WATSED data that has been produced to support the statement made on page EA-36 needs to be included in the project files. (#02 Mihelich, pp. 5-6)

Project File Documents AQ-57 and AQ-58 provide the WATSED model runs that show the expected tons of sediment per year baseline and the percentage increase in sediment from scheduled activities for existing condition, no action, and the proposed action alternative. Mr. Mihelich's statement that the activities would likely result in over 1,300 acres of logging activities in the wildlife cumulative effects analysis area is not accurate. There is no single cumulative effects analysis area for wildlife; as stated earlier, it varies by species.

Not all of the proposed activities in the Prichard-Murray Resource Area were included in the watershed cumulative effects analysis area because that project area extends another 5 to 6 miles down the North Fork of the Coeur d'Alene River, to Rookie Creek. The WATSED model limitation discussion in the Specialist's Report on Aquatics (Appendix D) explains that the appropriate area for watershed cumulative effects analysis is from 4 to 40 square miles of drainage area. Prichard Creek drainage above Eagle Creek is nearly 50 square miles. Therefore, increasing the size of the watershed cumulative effects analysis area would not have been within the limitations of the WATSED model, especially for a project of limited scope, such as Jo-Cat. The acres shown for the Prichard-Murray HFRA project are accurate for activities above Eagle Creek (EA, page A-14) based on the revised proposed action (Alternative 2) that is currently being analyzed (PF, AQ-59).

The preliminary WATSED runs for the proposed action alternative in the Prichard-Murray Resource Area, used to support the statement that the Prichard-Murray project would not have measurable effects on the watershed, have been included in the Jo-Cat project files (Project File Document AQ-61). In addition, some summary analysis from the draft Prichard-Murray Specialist's Report on Aquatic Resources has been included in the project files to support the determination that there has been a positive trend in the watershed (Project Files Document AQ-60).

9. Penalties: The discussions on page EA-39 do not mention any penalties that would be associated with the cutting of green trees in Units 8, 9a and 9b. What language will be included in the Jo-Cat sale contract regarding penalties that will be assessed for the cutting of green trees in these units? (#02 Mihelich, p. 6)

The discussion on page EA-39 addresses impacts to soils under the Proposed Action Alternative. The Forest Service will designate which trees are to be cut in these units. Unit 8 will only allow the removal of lodgepole pine trees, except lodgepole pine reserved from cutting with marking paint. Units 9a and 9b will be cut tree marked, where only trees marked for removal are designated for cutting. This will become part of the timber sale contract. Timber sale administration will monitor contractual operations. Penalties for potential violation of contract provisions are not addressed because they are outside the scope of the document. Cutting of undesignated timber would be considered a breach of contract. Willful theft of timber could lead to criminal charges.

10. Soils: The mass failure analysis and soils analysis needs to be included in the project files. (#02 Mihelich, p. 6)

Findings of the mass failure analysis performed by the Forest Soils Scientist is provided in the EA (pages EA-37 through EA-39) and discussed in the Specialist's Report on Soils (pages SOIL-4, 5). Maps and supporting information are also provided in the Project Files (Project File Documents SOIL-2 through SOIL-4, SOIL-Map Appendix, and SOIL-R38).

11. Roads: The Forest Service should try to base as much of the project activities off of existing roads and designate skid trails and landings. After harvesting and prescribed burning, the Forest Service should decommission, recontour, and revegetated as many of the roads in the project area as practicable. (#03 Smith, p. 1)

The new road being constructed in the Jo-Cat Resource Area would not create the concerns described due to location and design features. There are no new stream channel crossings; rolling dips would be designed into the roadway to control overland flow (EA-10); equipment would be required to be cleaned and the roadway seeded to reduce noxious weed invasion (EA-12). Rock fords would be designed into the existing roadway (EA-11) to reduce or eliminate long-term sediment potential and maintenance needs.

The economic analysis showed that new road construction is needed to create a viable timber sale opportunity. Just using the existing road would not allow for a viable timber sale due to the increased amount of helicopter, longer yarding distances, and increased costs due to limited access (SR-FIN-3). Even with the new road construction, approximately 40 percent of the harvested material would still require helicopter yarding.

Road densities in the resource area are not high. A Road Analysis Report was completed for this project (PF TRANS-01). Road 6006 into the area would provide a back-bone transportation system for potential future needs and can be implemented without the potential legacy problems mentioned.

12. Mechanical Treatments: The Forest Service should attempt to maximize the use of prescribed fire to accomplish the objectives, rather than logging and heavy equipment. (#03 Smith, p. 1)

This project would utilize a considerable amount of prescribed fire treatments. Approximately 75% of the commercial treatment areas would have prescribed fire (jackpot burn or underburns) utilized as part of the fuels reduction treatment (Table 1, EA-6). Use of prescribed fire alone would not meet part of the purpose and need for the project, which is to recover a portion of the timber value that is being (or projected to be) lost to the mountain pine beetles. Also, as stated in our response to scoping comments (PF, PI-15), use of prescribed fire only would lead to an outcome that would be uncertain and may not produce the desired end result.

13. Snags and Coarse Woody Debris: Ensure that adequate snags and coarse woody debris remain on site to accommodate the needs of wildlife species by following the Northern Region Snag Protocol. Where sufficient snags are not present, snags should be recruited by leaving larger ponderosa pine and larch to recruit future snags. Where larch or ponderosa pine snags are available, they should be retained. (#03 Smith, p. 2)

The Northern Region Snag Protocols and coarse woody debris guidelines would be met with this project (EA-14). Western larch thins would retain 90-110 trees per acre. Lodgepole removal treatments would retain, on average, approximately 15 to 28 trees of other species per acre. In addition, 2-6 live or dead lodgepole pine trees per acre would be retained in these units to provide recruitment of snags and coarse woody debris (EA-7, EA-8).

14. Old Growth: The Forest Service should ensure that it is meeting the standards for old growth analysis units or trending toward those standards. (#03 Smith, p. 2)

All standards for Old Growth Management Unit 113 are being met (p. EA-31 and the Specialist's Report on Forest Vegetation, pages VEG-21 through VEG-23). A detailed review of the old growth in Old Growth management Unit 113 (in which the Jo-Cat Resource Area is located) occurred with this analysis (p. EA-29). The review found that all previously allocated stands met old growth definitions (Project File Documents VEG-31, VEG-32, and VEG-34). In addition, two stands not previously allocated (one of which is within the resource area boundary) met old growth definitions, and are now allocated for old growth management (Project File Documents VEG-31, VEG-34).

15. Lodgepole Pine: We question the need to regenerate lodgepole pine stands. Recent research has shown that bark beetles play an active role in reducing stand densities and fire danger than has been thought (Romme et al, 2007). Additionally, the Forest Service is reducing the genetic variation and thus the probability of these species evolving with a heightened level of resistance to bark beetles. (#03 Smith, p. 2)

It is uncertain which publication Mr. Smith was citing, as there are several by Romme et al, 2007. A 2006 publication by Romme and others on "Recent Forest Insect Outbreaks and Fire Risk in Colorado Forests" states that even though insect outbreaks generally cannot be regarded as *ecological* emergencies, "there is no denying that the extensive stands of dead and dying trees do affect the aesthetic and economic attributes of many forests."

Small scale or endemic beetle attacks can reduce stand densities and fire connectivity, and these stands are not an immediate extreme fire danger threat. However, the high levels of existing and projected mortality within the Jo-Cat Resource Area will eventually lead to increased fuel conditions and an extremely hazardous situation (p. EA-22). Regeneration that naturally grows into this gathering of heavy down fuels would add to the volatility of the

situation (pages EA-22, 23). The article's discussion of forest insect outbreaks and the risk of wildfire provides some contrary discussions as to level of risk, however the author summarizes "that the interpretation presented is primarily theoretical and requires further study before definitive conclusions can be drawn." He then goes on to state that "the impact on subsequent fire behavior will be different depending on the proportion of the trees killed in the stand." Most of the Jo-Cat lodgepole pine treatment units are within high mortality or moderate to high risk stands.

The Romme article addresses salvaging insect-killed trees for economically valuable products, which is part of the purpose and need for the activities in the Jo-Cat Resource Area (DN-1, EA-2). "Although salvage of insect-killed trees usually is not necessary for the normal development of the forest, it may be a preferred option in some areas because of the economic value of the timber product that can be obtained. Harvest of large trees for economic reasons can be done in ways that minimize adverse ecological impacts, e.g., by laying out harvest units in spatial patterns that mimic the patterns created by natural disturbances such as fire," (Romme et al, 2006; Project File Document VEG-R100).

Under the Selected Alternative, 34% of the identified lodgepole pine areas with mountain pine beetle in the Jo-Cat Resource Area would be treated (p. EA-28). The remainder is either in the roadless area (which would not be treated), has mortality that is too scattered for treatment, or has a smaller size class that has less than a high to moderate risk of stand mortality, even though some mortality is present (p. EA-28).

Within the lodgepole pine removal treatment units, residual tree components would vary as the existing stand conditions vary, creating a natural mosaic of openings..." (p. EA-8).

"With the introduction of [prescribed] fire, the treatment areas would favor the natural re-establishment of these lodgepole pine mosaics and provide future high-quality forest habitat areas for lynx," (p. EA-9).



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March 29, 2007

NEPA Coordinator
Coeur d' Alene River Ranger District
2502 E. Sherman Ave.
Coeur d' Alene, ID 83814-5899

RE: Jo-Cat Environmental Assessment

Dear NEPA Coordinator:

The Idaho Department of Parks and Recreation staff reviewed the Jo-Cat Environmental Assessment. The Coeur d' Alene River Ranger District proposes to harvest timber in the Cat Creek and Jo Gulch drainages near Thompson Pass.

We previously commented on this project during the scoping period in May 2006. We were concerned about project impacts on the Idaho Centennial Trail (Stateline Trail #7).

The draft EA adequately addresses our concerns. While some of the sale units cover the trail, the purchaser would be required to repair any damage to the trail using hand tools. This mitigation measure should be sufficient as long as the contractor follows through with the mitigation measure. The Coeur d' Alene River Ranger District needs to monitor the trail for any damage during the project.

We reviewed the Recreation Analysis on Page 42 of the EA. The draft EA has an incorrect statement. The EA states; "This trail is a component of the Centennial Trail system, which begins in the Teton Mountains..." The Idaho Centennial Trail begins on the Idaho-Nevada border between Poison Creek and the East Fork Jarbidge River. The EA should state; "This trail is a component of the Centennial Trail system, which begins on the Idaho-Nevada border..."

We have attached a map showing the location of the trail.

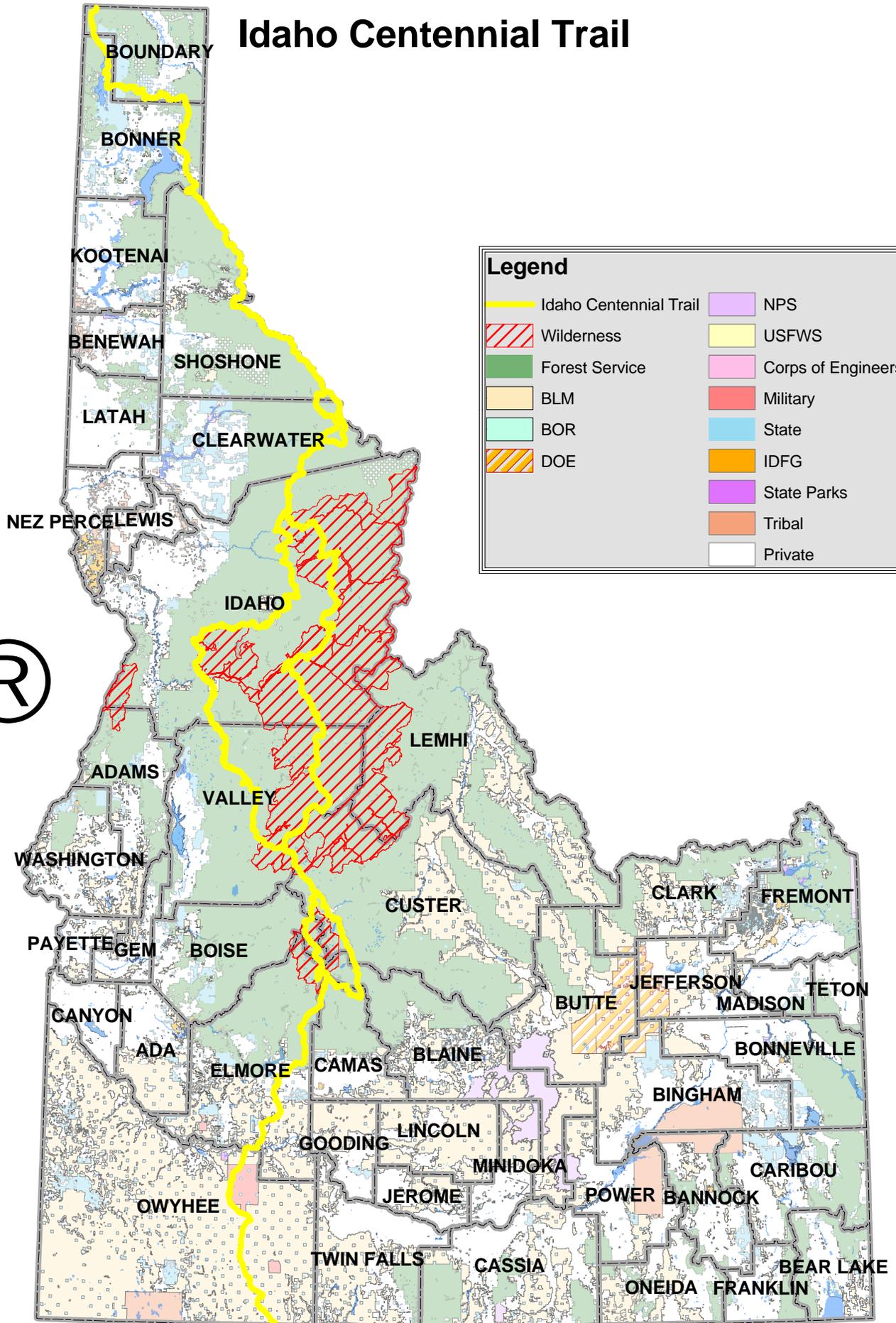
Thank you for the opportunity to comment on this proposal. If you have any questions about our comments, please contact me at (208) 334-4180 ext. 230.

Sincerely,

Jeff Cook, Outdoor Recreation Analyst
Comprehensive Planning, Research, and Review

Enclosure

Idaho Centennial Trail



Legend

	Idaho Centennial Trail		NPS
	Wilderness		USFWS
	Forest Service		Corps of Engineers
	BLM		Military
	BOR		State
	DOE		IDFG
			State Parks
			Tribal
			Private



Randy Swick, District Ranger
Coeur d'Alene River Ranger District
Fernan Office
2502 East Sherman Avenue
Coeur d'Alene, ID 83814-5899

April 17, 2007

Dear Mr. Swick:

The following comments concern the March 2007 Jo-Cat Resource Area Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI). Written comments were submitted by KEA on May 17, 2006 in response to the Jo-Cat scoping notice. The EMS process had not been formally instituted on the IPNF in May 2006 and as a result EMS concerns were not included in our comment letter. Comments are being submitted regarding EMS due to the EMS requirements that apply to individual projects such as Jo-Cat. These comments are being submitted electronically to comments-northern-idpanhandle-coeur-dalene@fs.fed.us.

1. Maple Peak Roadless Area:

The scoping notice indicated units, 8, 9, 14, and 15 would be located adjacent to the Roadless Area. The KEA comment letter of May 17, 2006 identified a number of concerns regarding the logging units adjacent to the roadless area and protection of the roadless area.

It is stated on pages EA-15 and EA-17 that no activities would occur within the roadless area, except prescribed burning that may encroach several hundred feet. The EA on page EA-43 states that units 8 and 15 are adjacent to the roadless area. On page EA-44 it is indicated that unit 8 would have 90% of the trees removed.

In contrast to the statement made on page EA-43, the two maps in Appendix C clearly show units 9a and 9b are also directly adjacent to the roadless area. Map 1 shows units 9a and 9b are scheduled for lodgepole salvage logging. Map 2 shows both units would be helicopter logged. 47 acres would be logged in the four units adjacent to the roadless area, EA at pages EA-9 and EA-10.

NEPA at 40 CFR 1500.1(b) requires high quality information with expert agency comments. The contradictory information in the EA regarding the number of logging units that are adjacent to the roadless area does not meet the NEPA requirements of 40 CFR 1500.1(b).

The following statement is made on page three of the Draft FONSI. "Integrity and manageability of the roadless area boundaries would be unchanged (p. EA-41, PF Doc. SR-08, page REC-3)." The wildlife discussion of Wolverine on page EA-41 does not address the issue of logging that may extend into the roadless areas directly adjacent to the logging units. As has been noted on page EA-44, 90% of unit 8 would be logged. There is no analysis in the EA regarding logging operations in units 8, 9a, 9b, and 15 that may enter the roadless area. There is no expert agency comments in the EA to sustain the

claim the integrity of the roadless area boundaries would be unchanged if logging operations occur in the four logging units.

On page four of the Draft FONSI, at #4 it is stated. "The effects of the activities in the Jo-Cat Resource Area on the quality of the human environment are not highly controversial as defined by the Council of Environmental Quality."

Logging activities that would enter the Maple Peak Roadless Area is a controversial issue, especially given the September 20, 2006 United States District Court for the Northern District of California order.

The project files for this project need to include a copy of the December 21, 2006 letter from the Washington Office, file code 1570, the subject being: Compliance with Court Order Injunctive Relieve for Roadless Area Management.

2. Environmental Management Systems:

The EMS process was instituted on the IPNF in June 2006. The USFS Region One website includes an EMS section. The following information is found on the Region One website.

Included, as part of EMS, is an Environmental Policy. The language found in the Environmental Policy states "The Northern Region Environmental Policy comes from the Forest Service Manual (FSM 1331): *"In conjunction with its mission, vision, and guiding principles; the Forest Service is committed to complying with applicable legal and other requirements, pollution prevention, and continual environmental improvement."*

The Region One EMS site describe Environmental Objectives of EMS as including vegetation management and travel management, and the Environmental Aspects of EMS include timber harvest (logging), fire suppression and wildland fire, and motorized travel. The Region One EMS site also indicated that EMS audits were to be performed by the IPNF in 2006. Were any EMS audits conducted on the Coeur d'Alene River Ranger District in 2006? If one or more audits were completed, was any audit information applied to the Jo-Cat project?

2a. EMS/Final Rule:

EMS regulations are described and listed in the Federal Register/ Vol 70. No 3/ Wednesday, January 5, 2005/ Rules and Regulations, in the section concerning the National Forest System Land Management Planning Final Rule, pages 1023 through 1061. The Final Rule became effective January 5, 2005.

A discussion of EMS in Section 219.5 of 36 CFR Part 219 is found on page 1042 of the Federal Register. The following language is found in Section 219.5. "The Department has chosen to require each administrative unit to carry out an EMS based on standards developed by the International Organization for Standards (ISO). Each administrative unit's EMS will serve as a framework for land management planning, adaptive management and, at the **project level**, provide information for EISS, EAs, or CEs where required by NEPA." (Emphasis added)

On page 1030 of the Federal Register the EMS discussions include the following statements. "The administrative unit's EMS will be a systematic approach to identify and

manage environmental conditions and obligations to achieve improved performance and environmental protection. Each unit's EMS will identify and prioritize environmental conditions; set objectives in light of Congressional, agency, and public goals; document procedures and practices to achieve those objectives; and monitor and measure environmental conditions to track performance and verify that objectives are being met. Agency management personnel will regularly review performance, and information about environmental conditions will be regularly updated to continually improve land management and environmental performance."

On page 1033 of the Federal Register there is a discussion that concerns "the relationship between EMS and NEPA." The first sentence in the discussion states, "Implementing EMS will improve the quality of agency NEPA analysis for **projects and activities.**" (Emphasis added)

The following statement is also found on page 1033. "This information will be used in formulating the land management plans that are subject to this rule, managing administrative units on an ongoing basis, as well as for **specific project and activity proposals** that trigger the need for EISs, EAs, or CEs." (Emphasis added)

The EMS process clearly applies to the Jo-Cat project. There is no discussion of EMS in the EA. The Draft FONSI does not address the EMS issue. What aspects of the EMS process have been used as part of this project and what aspects of EMS will be used if this project is implemented? Also, are there any Congressional goals that apply to this project?

Have the Washington Office or the Regional Forester issued new directives regarding implementing EMS in light of District Court rulings? The lack of analysis in the Draft FONSI and EA regarding EMS not indicate compliance with EMS rules and regulations.

3. Mountain Pine Beetle/ accurate scientific analyses:

The EA describes a mountain pine beetle problem in the project area and proposed to log 103 acres in stands that contain lodgepole pine, page EA-8. An additional 119 acres of western larch would be logged, page EA-7. The discussions on page EA-2 describe attacks on lodgepole stands that have been occurring for over 5 years.

NEPA requires accurate scientific analysis, as does EMS. NEPA and EMS requires scientific analysis from experts that do not agree with Forest Service findings. The EA does not to include high quality information from researchers, including entomologists that do not support the Forest Service's analysis of problems associated with mountain pine beetle attacks. Contrary analysis regarding pine beetle information can be found at www.davidsuzuki.org/Forests/Canaa/BC/Beetle. Additionally, findings by Dr. Arthur Partridge, professor emeritus of forest disease and insect problems, University of Idaho, Dr. Bill Romme, professor of forest ecology, Colorado State University, and Dr. Tim Schowalter, professor of entomology, Louisiana State University, do not support the FS contention mountain pine beetle attacks always require logging activities in order to protect ecosystems.

The EA does not discuss whether in fact the mountain pine beetles are natural functions in ecosystems. The EA does not discuss whether there is research that suggest forests have been found to be healthier after a beetle attack. The EA does not discuss associated effects of beetle attacks that lead to a healthy forest. The EA does not cite the FS research that analyzed the long-term impacts to lodgepole pine ecosystems after logging and road building activities had been completed.

The mountain pine beetle analysis in the EA does not indicate whether personnel from the District have monitored and recorded early autumn or mid-spring temperatures in the project area during the past 5 years. If monitoring data was acquired, this data needs to be included in the project files. The analysis needs to disclose if any unseasonably cold temperatures were noted and recorded by District personnel. If no temperature monitoring has been conducted in the project area, what analysis methods are being used as part of the temperature analysis that is required in order to confirm mountain pine beetle populations are at an epidemic level?

The EA does not contain a discussion of previous Forest Service logging operations in the mountain pine beetle areas that included stands where Armillaria or Annosus root rot diseases were present.

The EA should have a summary of the Forest Service monitoring data that indicates whether the logging in stands with Armillaria or Annosus diseases increased or decreased the incidence of mountain pine beetle attacks. If little or no monitoring data exists, the EA should have disclosed there is incomplete or unavailable root rot monitoring data, NEPA at 40 CFR 1502.22.

The literature being used for the mountain pine beetle analysis should include the following papers.

Western Pine Beetle, Clarence J. Demars, Jr., Bruse H. Roettgering, USDA Forest Service, Pacific Southwest Region, San Francisco, CA, Forest Insect & Disease Leaflet 1, U.S. Department of Agriculture Forest Service, Revised November 1982, located at <http://www.barkbeetles.org/western/WPBFIDL.1.htm>

“Root Diseases in Coniferous Forests of the Inland West: Potential Implications of Fuels Treatments,” Rippy Raini C, et al, USDA, Forest Service, Rocky Mountain Research Station, Gen. Tech. Rep. RMRS-GTR-141. Fort Collins, CO, 32 p. <http://fs.fed.us/rm>

4. Wildlife/cumulative effects:

On page B-1 of the EA it is indicated the project area is within a lynx analysis unit and Canada lynx is listed as a threatened species under the ESA. The wildlife discussions are found on pages EA-40, EA-41, and a portion of EA-42. The sentence on page EA-42 regarding cumulative effects and reasonably foreseeable activities references p. WL-10. On page A-14 the Prichard/Murray HFRA timber sale project is listed as being in the Watershed Cumulative Effects Area (Prichard Creek above Eagle). 75 acres of shelterwood logging and 67 acres of commercial thinning are listed as being included in the planned Prichard/Murray timber sale. The January 16, 2007 IPNF SOPA describes the Prichard/Murray timber sale as including 500 to 750 acres of logging that would include shelterwood logging, regeneration logging, and commercial thinning, and

between 1,400 and 1,750 acres of prescribed burning. The logging would remove between 6MMBF and 8 MMBF. Logging on BLM lands and on private property in Bear Gulch are also shown on page A-14 of the EA. The 293 acres of logging associated with Jo-Cat, together with Prichard/Murray, BLM, and private logging likely amounts to over 1,300 acres in the wildlife cumulative effects analysis area.

The cumulative effects discussions on pages A-14 and A-15 of the EA do not mention any wildlife issues associated with the Prichard/Murray project, the BLM project, or the private logging in Bear Gulch.

There is no supporting data in the cumulative effects discussions in the EA to support the statement on page 3 of Draft FONSI that states there will be no loss of viability to populations or species. The lack of a truce wildlife cumulative effects analysis in the EA does not indicate full compliance with NFMA regulations, including regulations that address T& E species, MIS and MIS habitat.

5. Vegetation/Mature trees:

On page EA-14 it is stated. "Western white pine and western larch of all sizes would be favored to retain on the site (especially those 18 inches or greater in diameter) unless removal is unavoidable due to safety reasons or special circumstances." The project files need to include the stand number of the stands in one or more of the proposed logging units that include trees 16" and larger.

6. Aquatics:

The aquatics analysis in the EA includes pages EA-34, EA-35, and EA-36. It is indicated on page EA-34 that Prichard Creek has an approved sediment TMDL. The Jo-Cat project area is located in the headwaters of Prichard Creek drainage, page EA-35. The WATSED model is being used as part of the aquatics analysis, page EA-34. The model has limitations regarding routing of sediment through stream channels. This limitation has been previously acknowledged in the WATBAL Technical User Guide dated February 1989, pages 15 and 16. "It is recognized that this lack of accurate stream routing and insufficient recognition of stream dynamics is the weakest and as a critical element must be given top priority in future developments."

WATSED Version II PC/96 on page 11 includes a discussion of routing and storage. The following sentence is found in the discussions on page 11 of the WATSED manual. "To estimate the amount of sediment delivered to the critical reach, the accumulated sediment yields are modified by a channel sediment routing coefficient based on the drainage area." The discussion on page 11 ends with the following statement. "Sediment routing and accumulated sediment routing is a part of the model that should be recognized and interpreted by professional hydrologists for each situation." The Jo-Cat project files needs to include the sediment routing data that has been generated as part of the sediment analysis and stream dynamics analysis for this project.

On page EA-36 the following statement is made. "Cumulatively, the Proposed Action in conjunction with ongoing and reasonably foreseeable projects would not have any measurable effect to sediment yields." The analysis on page EA-36 does not include data from the WATSED model showing the expected tons of sediment per year that would be

generated from the combined BLM, Prichard/Murray logging, and private logging that likely would result in over 1,300 acres of logging activities in the Prichard Creek drainage. The WATSED data that has been produced to support the statement made on page EA-36 needs to be included in the project files.

The following statement is found on page A-14. "Since no measurable effects would be generated with Prichard/Murray, this positive trend would not be affect. (sic). The WATSED analysis that clearly shows sediment routing and accumulated sediment routing associated with the Prichard/Murray project would not result in any measurable effects needs to be included in the project files.

7. Soils:

On page EA-39 it is indicated there is an area of moderate mass failure potential below logging units 8 and 9, and within the drainage area that divides units 9a and 9b. Logging in unit 9 is described as removing only dead lodgepole pine. Unit 9a is 9 acres in size and unit 9b is 11 acres in size, page EA-10. The discussions on page EA-39 do not mention any penalties that would be associated with the cutting of green trees in units 8, 9a, and 9b. What language will be included in the Jo-Cat sale contract regarding penalties that will be assessed for the cutting of green trees in units 8, 9a, and 9b?

The mass failure analysis and soils analysis performed by the Forest soils scientist in the areas that include units 8, 9a and 9b needs to be included in the project files. If the Forest soils scientist did not the mass failure analysis or soils analysis in any proposed logging units, the mass failure analysis and soils analysis that was performed in the project area by District soils specialists need to be included in the project files.

We wish to remain on the mailing list for this project. These comments are also being submitted on behalf of the following organizations. The Lands Council, Mike Petersen, 423 W. First Ave., Suite 240, Spokane, WA 99201 and WildWest Institute, Jeff Juel, P.O. Box 7998, Missoula, MT 59807.

Sincerely,

/S/

Mike Mihelich

Forest Watch Coordinator 208-664-4741, or 667-9093

Kootenai Environmental Alliance

P.O. Box 1598

Coeur d'Alene, ID 83816-1598



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Linda McFaddan, Deputy District Ranger
Coeur d'Alene River Ranger District – Fernan Office
2502 East Sherman Avenue
Coeur d'Alene, Idaho 83814

E-mail: comments-northern-idpanhandle-coeur-dalene@fs.fed.us

April 20, 2007

RE: Idaho Conservation League Comments Regarding the Jo-Cat Resource Area Environmental Assessment

Dear Linda,

Thank you for considering our comments on this project. For thirty years, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. For more information or to become a member, visit www.wildidaho.org. As Idaho's largest state-based conservation organization we represent over 9,000 members, many of whom have a deep personal interest in protecting our water, wildlands, and wildlife.

We appreciate the level of analysis that the Coeur d'Alene River Ranger District has conducted in developing this project. This analysis is illustrative of the tenets of NEPA—to provide for public involvement and ensure that the agency has arrived at a reason and informed decision. Rather than trying to expedite this project with a categorical exclusion, we applaud that fact that the Forest Service has conducted the level of NEPA that they have here.

In terms of site-specific comments on the project, we are concerned about the permanent roads that will remain in the project area following implementation. The Coeur d'Alene River Ranger District has some of the highest road densities in the entire National Forest System. These legacy roads lead to erosion, sediment delivery, water quality problems, degradation of fish habitat, and have provided a vector for the spread of noxious weeds. The Forest Service should try to base as much of the project activities off of existing roads and designate skid trails and landings. After harvesting and prescribed burning, the Forest Service should decommission, recontour, and revegetate as many of the roads in the project area as practicable to minimize the impacts listed above.

Also, the Forest Service should attempt to maximize the use of prescribed fire to accomplish the objectives of the project. Prescribed fire is one of the most natural tools available to the agency to accomplish resource management objectives, more adequately emulates natural disturbances, and results in fewer environmental impacts compared to logging and the heavy equipment associated with mechanical treatments.

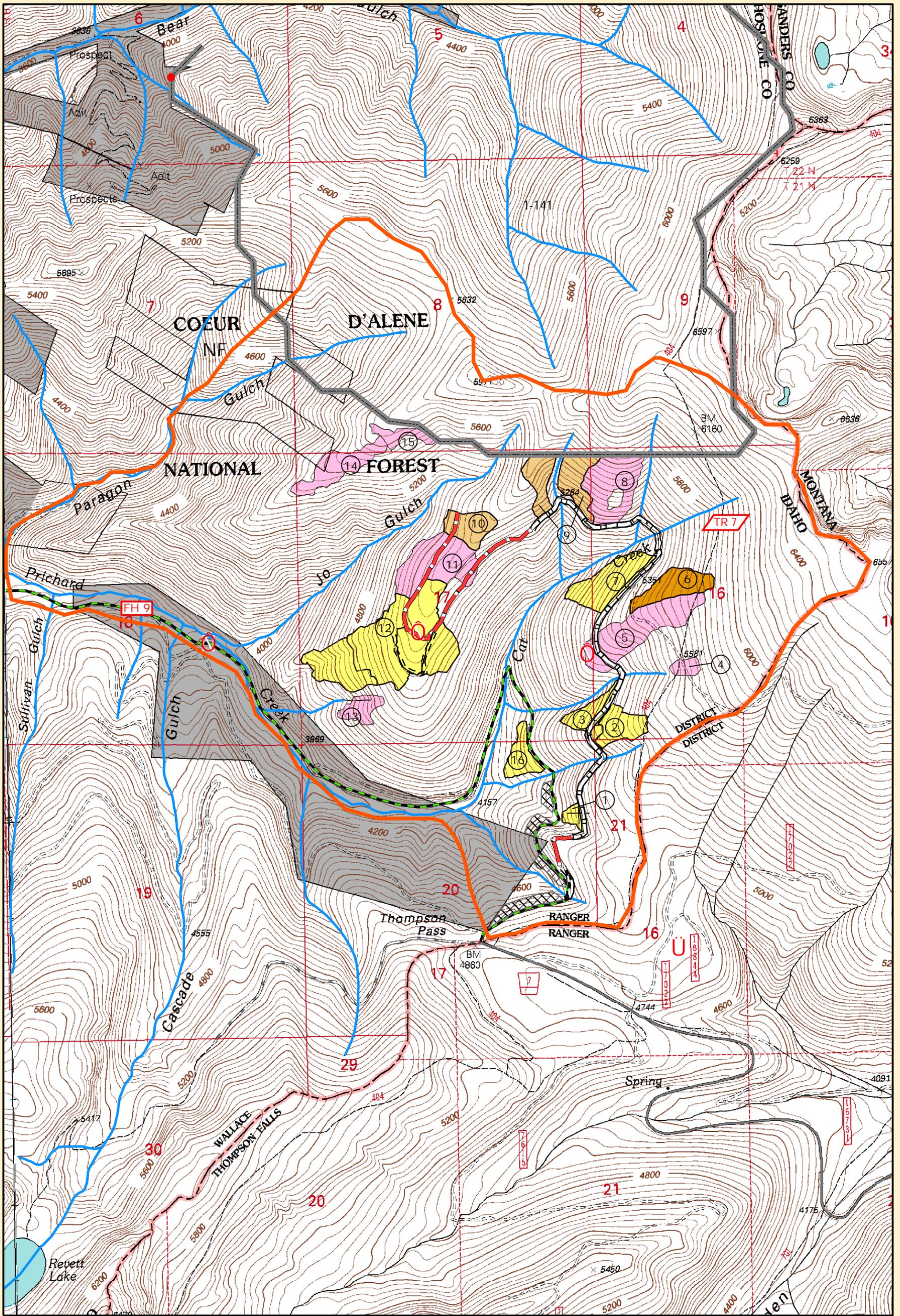
We appreciate that all un-merchantable dead wood would be left to benefit wildlife. However, there may be some snags or merchantable trees and merchantable snags that would benefit wildlife. The Coeur d'Alene River Ranger District should ensure that adequate snags and coarse woody debris remain on site to accommodate the needs of these species by following the Northern Region Snag Protocol. Where sufficient snags are not present, snags should be recruited by leaving larger ponderosa pine and larch to recruit future snags. Where larch or ponderosa pine snags are available, they should be retained. Furthermore, the Forest Service should ensure that it is meeting the standards for old growth analysis units or trending toward those standards.

Lastly, we question the need to regenerate lodgepole pine stands. Recent research has shown that bark beetles play an active role in reducing stand densities and fire danger than has been thought (Romme et al, 2007). Additionally, by removing trees that have been infested by beetles, but which have not died, the Forest Service is reducing the genetic variation and thus the probability of these species evolving with a heightened level of resistance to bark beetles.

Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project. We look forward to continuing to work with the Coeur d'Alene River Ranger District on this project and others in the future.

Sincerely,

/s/Bradley Smith,
Public Lands Associate



4

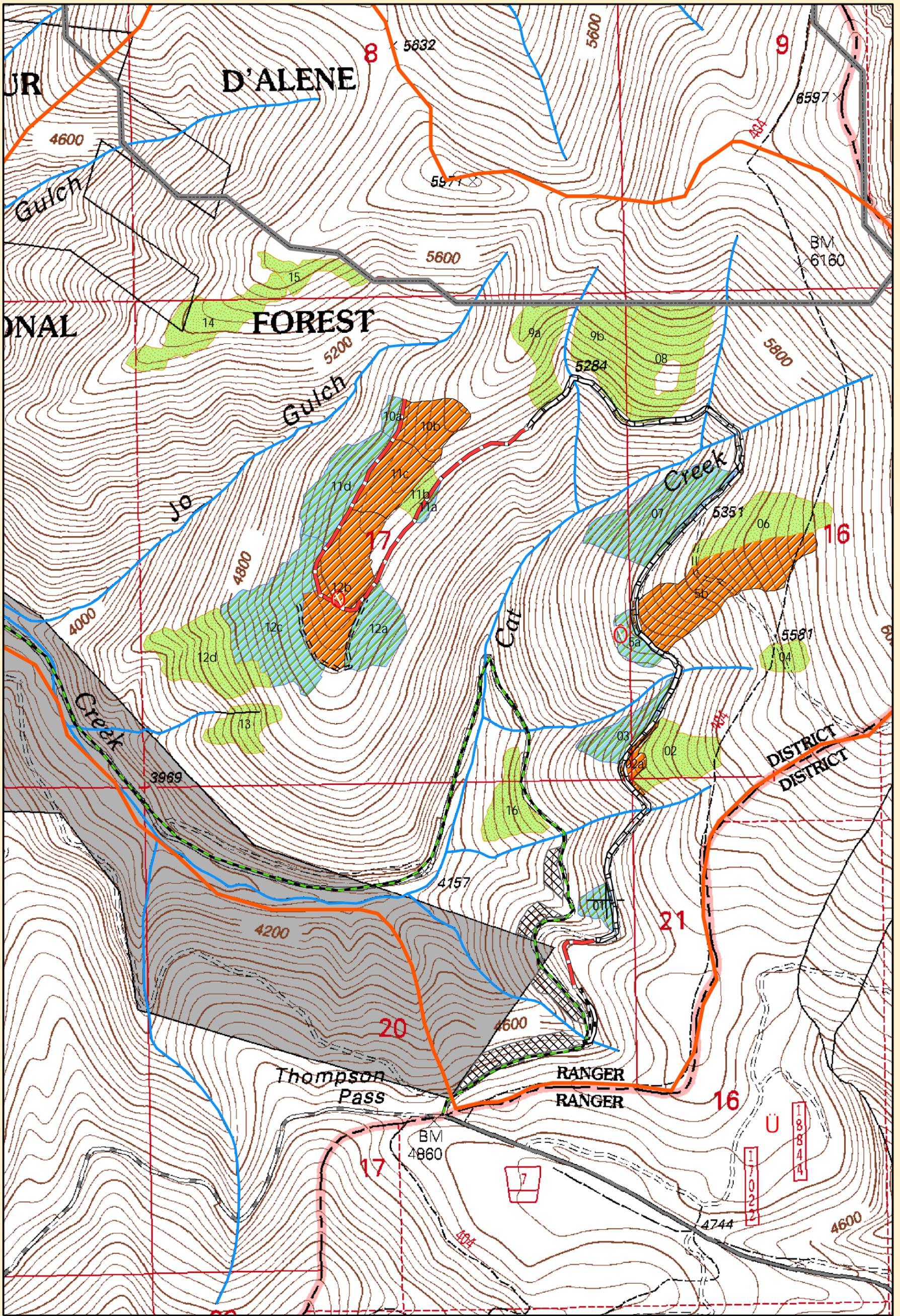
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Jo-Cat Analysis Area
Coeur d'Alene River Ranger District
Idaho Panhandle National Forests

- Helicopter Landings
- FH_9
- Roadless Boundary
- Existing Approach
- New Construction
- Reconstruction
- Temporary Road

- Legend
- Ownership**
- Private
 - Forest Service
 - Hand Fuels Reduction
 - Trails
 - Project Boundary

- Treatments**
- Lodgepole Removal
 - Lodgepole Salvage
 - W. Larch Thinning
 - Lodgepole Overstory Removal



4

Scale = 1:12000
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Jo-Cat Analysis Area
Coeur d'Alene River Ranger District
Idaho Panhandle National Forests

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> Helicopter Landings FH_9 Roadless Boundary Existing Approach New Construction Reconstruction Temporary Road | <p>Legend</p> <p>Ownership</p> <ul style="list-style-type: none"> Private Forest Service Hand Fuels Reduction Trails Project Boundary | <p>Logging Method</p> <ul style="list-style-type: none"> Helicopter Skyline Tractor |
|--|---|--|